

Page 1		Page 3	
1	IN THE UNITED STATES DISTRICT COURT	1	I N D E X
2	FOR THE SOUTHERN DISTRICT OF TEXAS	2	PAGE
3	CORPUS CHRISTI DIVISION	3	Appearances
4	WALTON CUDE)	4	Stipulations
5	Plaintiff)	5	
6	V.) CIVIL ACTION NO. 2:19cv388	6	WITNESS: BILL MARTIN WINKFEIN
7	AEP TEXAS, INC.)	7	Examination by Mr. Swallow
8	Defendant)	8	Examination by Mr. Schauer
9		9	Examination by Mr. Swallow
10		10	Examination by Mr. Schauer
11		11	
12	VIDEOTAPED DEPOSITION OF	12	CHANGES AND SIGNATURE
13	BILL MARTIN WINKFEIN	13	REPORTER'S CERTIFICATE
14	OCTOBER 30, 2020	14	
15	(Reported Remotely)	15	
16		16	
17		17	
18		18	
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	
25		25	

Page 2		Page 4	
1	A P P E A R A N C E S	1	E X H I B I T S
2		2	NUMBER DESCRIPTION PAGE
3	COUNSEL FOR THE PLAINTIFF:	3	FOR THE PLAINTIFF:
4	Mr. John Swallow	4	Exhibit 1 Certification Cards
5	Mr. Jacob Hubert	5	Exhibit 2 Power box
6	HUSEMAN LAW FIRM	6	Exhibit 3 Rusted transformer 02
7	615 N. Upper Broadway	7	Exhibit 4 Rusted transformer 03
8	Suite 2000	8	Exhibit 5 Rusted transformer 04
9	Corpus Christi, Texas 78401	9	Exhibit 6 Rusted transformer 05
10	361-883-3563	10	Exhibit 7 Rusted transformer 06
11	jswallow@husemanlawfirm.com	11	Exhibit 8 Rusted transformer 07
12	jhubert@husemanlawfirm.com	12	Exhibit 9 Rusted transformer
13		13	Exhibit 10 Service drop
14	COUNSEL FOR THE DEFENDANT:	14	Exhibit 11 Power lines
15	Mr. G. Don Schauer	15	Exhibit 12 Plants growing on wires
16	SCHAUER & SIMANK, P.C.	16	Exhibit 13 Cracked wires
17	615 N. Upper Broadway	17	Exhibit 14 Burnt power pole
18	Suite 700	18	Exhibit 15 1115 Vista lane after fire
19	Corpus Christi, Texas 78401-0781	19	Exhibit 16 Picture of fire, nighttime
20	361-884-2800	20	Exhibit 17 Picture of melted triplex
21	dschauer@cctxlaw.com	21	Exhibit 18 AEP ground wire
22		22	Exhibit 19 AEP transformer, Cude residence
23	ALSO PRESENT:	23	Exhibit 20 AEP transformer
24	Mr. Jonathan Nunez, Videographer	24	Exhibit 21 AEP transformer tag
25		25	Exhibit 22 AEP transformer pole

<p>1 Exhibit 23 AEP service pole 3 116 2 Exhibit 24 Winkfein statement 108 3 Exhibit 25 AEP illustration ground pole 36 4 Exhibit 26 NEC and Lineman's book 96 5 Exhibit 27 AEP Guide for Electric Service and Meter Installations 109 6 7 Exhibit 28 Map (to be provided) 8 9 Exhibit 29 Distribution Standards Manual 201 10 (to be provided) 11 FOR THE DEFENDANT: 12 Exhibit 1 AEP Texas, Inc.'s Cross-Notice of Intent to Take the Oral and Videotaped Deposition of Plaintiff's Expert Witness, Bill Winkfein, With Supboena Duces Tecum 125 13 Exhibit 2 Letter of Bill Winkfein 126 14 Exhibit 3 Panel photo 133 15 Exhibit 4 Photograph (not identified in transcript) 16 17 Exhibit 5 Eaton Whole House Surge Protection document 137 18 Exhibit 6 Photograph, Electrical Power Pole for 111 Vista 10 Lane 145 19 20 Exhibit 7 Report of Mr. Cude 146 21 22 Exhibit 8 Photographs (4) 62 23 24 Exhibit 9 Call record 62 25</p>	Page 5	<p>1 Mr. Winkfein? 2 A. Not bad for a Friday. 3 Q. All right. Any -- anything -- are you feeling 4 all right, ready to give your deposition this morning? 5 A. Sure. 6 Q. Okay. Anything that would prevent you from 7 giving your deposition or giving honest, truthful 8 testimony this morning? 9 A. No. 10 Q. Okay. Why don't -- why don't we just get for 11 the record real quick, where -- where are you located 12 this morning? 13 A. At Bill Cude's house. 14 Q. Okay. And I'll represent for the record, my 15 name is John Swallow and I'm an attorney for -- for 16 plaintiff in this matter, Walton Cude. 17 Is Mr. Cude there with you this morning? 18 A. Yes. 19 Q. Okay. And do you know -- do you know the 20 address for Mr. Cude's residence? 21 A. Not right offhand. 22 Q. Okay. Is it -- does 595 South Vista Drive in 23 Sandia, Texas sound -- 24 A. Yeah. 25 Q. -- about right?</p>	Page 7
<p>1 PROCEEDINGS 2 (Exhibits 1 - 27 premarked.) 3 THE VIDEOGRAPHER: Today is Friday, the 4 date is October 30th, 2020. The time is 10:06 a.m. We 5 are now on the record. 6 THE REPORTER: Okay. This deposition is 7 being conducted remotely by LegalView. 8 (Bill Martin Winkfein sworn.) 9 THE REPORTER: Do you have any agreements 10 for the record? 11 MR. SCHAUER: I'm fine to go. 12 MR. SWALLOW: Don, you got anything? 13 MR. SCHAUER: No, I'm ready to roll. 14 MR. SWALLOW: Then go ahead. Sounds 15 good. 16 Can we proceed, then? 17 THE REPORTER: Yes. 18 BILL MARTIN WINKFEIN, 19 having been duly sworn, testified as follows: 20 EXAMINATION 21 BY MR. SWALLOW: 22 Q. Good morning, Mr. Winkfein. Can you -- can 23 you give your full name for the record, please? 24 A. Bill Martin Winkfein. 25 Q. And how are you feeling this morning,</p>	Page 6	<p>1 A. Yes. 2 Q. Okay. And the reason -- and I don't want to 3 go into too much detail, but the reason we're doing the 4 deposition this morning via Zoom is because of personal 5 health reasons, correct? 6 A. Yes. 7 Q. Okay. All right. 8 A. My -- my nurse is supposed to come over this 9 morning, but I put her off till Monday. 10 Q. Okay. All right. I appreciate that. And -- 11 and I appreciate you taking the time to give your 12 deposition -- deposition this morning and help us out. 13 Where do you -- where do you currently 14 live, Mr. Winkfein? 15 A. 135 Mohawk Drive, Sandia, Texas. 16 Q. And how long have you lived there? 17 A. Oh, probably around 11 years or so. 18 Q. All right. And where -- where is -- where is 19 Mohawk -- Mohawk Drive located? 20 A. It's in the Arrowhead subdivision. 21 Q. Okay. And is that -- is that the -- are you 22 currently -- are you giving your deposition this morning 23 from the Arrowhead subdivision? 24 A. Yes. 25 Q. And is that where the -- the incident, the</p>	Page 8

<p>Page 9</p> <p>1 fire that -- that is the subject of this case, is that 2 where that also occurred?</p> <p>3 A. Yes.</p> <p>4 Q. And if you would for the jury, just where -- 5 where y'all are located now, how far is that from -- 6 from the fire?</p> <p>7 A. Oh, probably a mile.</p> <p>8 Q. Okay. Same general area. And how long -- how 9 long have you lived in the Arrow- -- Arrowhead 10 subdivision? I think you said about 11 years; is that 11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. And I didn't ask this at the beginning, but 14 have you ever given a deposition before?</p> <p>15 A. No.</p> <p>16 Q. Okay. And -- and I don't think you -- I don't 17 think we're going to have any problems today, but if you 18 have -- if -- if you have any questions, please feel 19 free to -- feel free to stop. Or if you don't 20 understand something that I ask, please -- please -- or 21 that Mr. Schauer asks, please feel free to stop us 22 and -- and just ask for a clarification.</p> <p>23 And if you have to take a break as well, 24 just let us know. And the other big rule is, you know, 25 we'll try not to -- to talk over each other, but I think</p>	<p>Page 11</p> <p>1 MR. SWALLOW: Why don't we fix that right 2 now?</p> <p>3 Yeah, Mr. Winkfein, if you can either 4 move the computer or scoot a bit closer.</p> <p>5 THE WITNESS: Okay, I'm closer.</p> <p>6 MR. SWALLOW: And if we need to, do you 7 want us to take a break and adjust the audio levels on 8 the computer?</p> <p>9 THE REPORTER: That might be good.</p> <p>10 MR. SWALLOW: Why -- why don't we try 11 that? I'm sorry, but yeah, I was having a little -- 12 little hard time hearing as well.</p> <p>13 THE VIDEOGRAPHER: All right. The time 14 is -- the time is 11:11 -- 10:11, excuse me. We are now 15 off the record.</p> <p>16 (Break from 10:11 to 10:13 a.m.)</p> <p>17 THE VIDEOGRAPHER: The time is 10:13 a.m. 18 We are now on the record.</p> <p>19 Q. (BY MR. SWALLOW) Mr. Winkfein, you indicated 20 you were retired. Do you -- do you still maintain 21 electrical certification so you can continue to do 22 electrical work?</p> <p>23 A. Yes.</p> <p>24 Q. And what sort of certifications do you 25 maintain?</p>
<p>Page 10</p> <p>1 we're doing a good job of that.</p> <p>2 What do you currently do, Mr. -- 3 Mr. Winkfein?</p> <p>4 A. I'm retired.</p> <p>5 Q. Okay. What did you do before you were 6 retired?</p> <p>7 A. I was an electrical contractor.</p> <p>8 Q. And how long ago did you retire?</p> <p>9 A. It's been -- it's been six, seven years ago 10 or more, or longer.</p> <p>11 Q. Do you still work as an electrical contractor 12 even though you're -- you're retired?</p> <p>13 A. I just do some --</p> <p>14 THE REPORTER: Pardon? What was the 15 answer?</p> <p>16 A. I just do things for friends of mine. I'll 17 cut the leg bolts or tell them how to wire something up. 18 That's about it. I just do that at my home.</p> <p>19 Q. Okay.</p> <p>20 MR. SWALLOW: Sandy, are you able to hear 21 Mr. Winkfein all right?</p> <p>22 THE REPORTER: Well, it's difficult.</p> <p>23 MR. SWALLOW: Okay.</p> <p>24 THE REPORTER: Could he get closer, do 25 you think?</p>	<p>Page 12</p> <p>1 A. Well, I have -- I hold a master's license for 2 the state of Texas right now. I still hold my master's 3 license and everything in the state of Tennessee. Of 4 course, that license is good for the east coast 5 including Florida.</p> <p>6 Q. Okay. Mr. Winkfein, you provided me with a 7 couple cards. I'm going to put those up on the screen 8 right now. Can you tell us what we're looking at here?</p> <p>9 This has -- this has been marked as Exhibit 1.</p> <p>10 A. That's the International Brotherhood of 11 Electrical Workers. That's a union company, it's 12 throughout the United States.</p> <p>13 Q. Okay. Is this a certification?</p> <p>14 A. It's just a card that I'm a member of that 15 organization.</p> <p>16 Q. And I have one more -- one more card here. 17 This is Exhibit 1 as well. This is from the State of 18 Texas. Can you tell us what this is?</p> <p>19 A. That's a state of Texas master's electrician 20 license. It's from the Department -- Texas Department 21 of License and Regulations, which I have to renew once a 22 year. I have to do a four-hour refresher course once a 23 year.</p> <p>24 Q. And this allows you to work as a -- as a 25 master electrician in Texas?</p>

<p style="text-align: right;">Page 13</p> <p>1 A. Yes, it's good for Texas, Oklahoma, Arkansas</p> <p>2 and Louisiana.</p> <p>3 Q. Okay. And you've maintained this current</p> <p>4 since -- how many years have you had this license?</p> <p>5 A. I can't remember. I've had it probably way</p> <p>6 over 30-something years.</p> <p>7 Q. Okay. You mentioned a couple other</p> <p>8 certifications and I don't think I got those. Do you</p> <p>9 have cards for those or certificates?</p> <p>10 A. I don't have anything with me at the moment.</p> <p>11 Q. Would those -- would those be at home, or</p> <p>12 where -- where would we find those?</p> <p>13 A. They would be home somewhere, probably in a</p> <p>14 box somewhere.</p> <p>15 Q. Okay. All right. If -- if we ask you to get</p> <p>16 those, do you think you might be able to provide those</p> <p>17 to Mr. Schauer?</p> <p>18 A. I can try to find them, yes, sir.</p> <p>19 Q. Okay. And we're not going to worry about them</p> <p>20 today, but...</p> <p>21 Can you tell us a little bit about your</p> <p>22 background in electrical field? What -- what -- what</p> <p>23 was your formal training? Where did you go to school,</p> <p>24 that sort of stuff?</p> <p>25 A. I went to University of Tennessee, got my</p>	<p style="text-align: right;">Page 15</p> <p>1 Redstone Arsenal. I did some more work for them up in</p> <p>2 Washington, D.C. Installed in their computer room. Up</p> <p>3 there they don't call it mass up there, which it is, but</p> <p>4 they call it e-Systems up there.</p> <p>5 And I've done water treatment plants,</p> <p>6 I've done skyscrapers, I've done hotels, motels,</p> <p>7 restaurants, apartment buildings and residential. And</p> <p>8 I've worked in refineries and chemical plants and</p> <p>9 factories.</p> <p>10 Q. And it sounds like you've had a fair amount of</p> <p>11 experience in -- is this both in the -- I guess -- I'm</p> <p>12 not sure how to put it, this into layman's terms for the</p> <p>13 jury, but you've -- it sounds like you've done quite a</p> <p>14 bit of things both internal wiring as well as -- as</p> <p>15 external hookups?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. And I've done work for Exxon where I used to</p> <p>19 hook up these 2,000 horsepower motors on the pipelines.</p> <p>20 Q. Can you tell us a little bit, too, about --</p> <p>21 since this is a residential tech case, can you tell us a</p> <p>22 little bit more about your residential experience as</p> <p>23 well?</p> <p>24 A. Certainly. I've done numerous homes and</p> <p>25 apartment buildings. There's not much to them. They're</p>
<p style="text-align: right;">Page 14</p> <p>1 master's license certificate, master's in electrical</p> <p>2 engineering. I went through the International</p> <p>3 Brotherhood of Electrical Workers. I worked for them a</p> <p>4 numerous amount of years. And I worked for the union</p> <p>5 companies throughout the United States. And I also</p> <p>6 worked for myself throughout the United States.</p> <p>7 Q. And when did you graduate from school?</p> <p>8 A. It was right when I got out of Vietnam. I</p> <p>9 think it was -- I got out around '70 -- probably</p> <p>10 around 1974, somewhere in that era.</p> <p>11 Q. And -- and you graduated from the University</p> <p>12 of Tennessee. Was that a bachelor's degree or did you</p> <p>13 say that was a master's degree? What was that?</p> <p>14 A. That was a master's.</p> <p>15 Q. Okay. In electrical engineering?</p> <p>16 A. Yes.</p> <p>17 Q. And that was around 1970? Is that --</p> <p>18 A. Probably '74.</p> <p>19 Q. Okay. Well, you would have graduated in '74.</p> <p>20 That makes sense.</p> <p>21 Any -- any other formal training that</p> <p>22 you've had over the years related to electrical field?</p> <p>23 A. I've -- I've run numerous projects for wiring</p> <p>24 hospitals. I've done power plants. I've hooked up</p> <p>25 robotics in Huntsville, Alabama in a place called</p>	<p style="text-align: right;">Page 16</p> <p>1 a lot easier than wiring a hospital. I don't know how</p> <p>2 much you can say about it. All you do is go to the</p> <p>3 prints and the specs. Each house is different with a</p> <p>4 set of blueprints. You've got to wire accordingly, then</p> <p>5 you've got to wire accordingly to the National Electric</p> <p>6 Code.</p> <p>7 Q. Do you have any particular experience working</p> <p>8 with transformers, that sort of stuff?</p> <p>9 A. I've worked numerous times. I've hooked up --</p> <p>10 I don't know how many transformers I've hooked up</p> <p>11 throughout the years. I've hooked them up in, like,</p> <p>12 hospitals, I've hooked them up in schools. I've done it</p> <p>13 in hotels, motels. The list goes on and on and on.</p> <p>14 Q. Okay. How about with -- with regard to</p> <p>15 maintenance and -- and things like that with</p> <p>16 transformers? Are you familiar with the requirements,</p> <p>17 industry standards relating to that?</p> <p>18 A. Yes, you're required to have a -- on a</p> <p>19 transformer you're supposed to have a polar current</p> <p>20 protection on the primary side of those transformers and</p> <p>21 on the secondary side of those transformers.</p> <p>22 Q. Okay. And I'm more interested just with</p> <p>23 regard to your work or your education, experience. Do</p> <p>24 you have -- do you have experience that would give you,</p> <p>25 you know, special knowledge in that area as far as</p>

<p style="text-align: right;">Page 17</p> <p>1 hooking up, you know, service connections to houses, 2 installation of service connections, maintenance of 3 transformers and things of that nature? 4 A. On service, you put out a brand new panel, or 5 service they call it, and you put -- all your wires are 6 coming out. You put those over their own marks and you 7 put them on different types of breakers, whether it's a 8 20- or 30-amp breaker or 60-amp breaker. You go out of 9 that, you feed into a meter and you make what's called a 10 riser and have a weatherhead on it. Then the power 11 company comes out and connects it. 12 Q. Okay. And -- and as far as your background, 13 though, I understand -- I understand you have a lot of 14 experience. Maybe just give us some examples of -- have 15 you -- have you had experience hooking up service 16 connections, that sort of stuff? And I know we talked a 17 little bit about the hospitals, residential. But is 18 that something you can speak to? Is that something 19 you've done quite a bit in your -- in your work? 20 A. I've done quite a bit of that. 21 Q. Okay. 22 A. I've done all the service work. I've come 23 from the power companies, transformers, and feed them 24 back into the buildings which goes into what's called a 25 switchgear. A lot of your hospitals, they got back-up</p>	<p style="text-align: right;">Page 19</p> <p>1 A. My master electrical license certifies that. 2 Q. Okay. And the master electrical license, is 3 that from -- is that from Tennessee, the University of 4 Tennessee, or where -- where is that from? Or is that a 5 master electrician license from Texas? 6 A. It's one -- we just had all the 7 (unintelligible) from the state of Texas. 8 Q. Okay. So -- so the -- your master electrician 9 license here from the state of Texas, that would -- 10 which I've put it back up on the screen, Exhibit 1 -- 11 that would qualify you as well to work on, you know, 12 transformers, grid electrical distribution systems; is 13 that correct? 14 A. Correct. 15 Q. Okay. Did you know the plaintiff in this 16 case, Walton Cude, prior -- prior to you working as a -- 17 as an expert? 18 A. Yes. 19 Q. Okay. And can you tell us a little bit 20 about -- how long have you known Mr. Cude? 21 A. Oh, I'd say about nine or 10 years. 22 Q. Did y'all -- did y'all meet in the Arrowhead 23 neighborhood? 24 A. Yes. 25 Q. And has Mr. Cude lived out there for a similar</p>
<p style="text-align: right;">Page 18</p> <p>1 generators on there, and you've got to test all that. 2 Q. Okay. And with -- for your certifications 3 that you have, is -- is that primarily related to 4 service side installations or is that -- is that also 5 related to, you know, lineman stuff, how to -- you know, 6 how to maintain transformers, electrical grids, that 7 sort of stuff? 8 A. Well, that -- I've got the license which I 9 took in the state of Tennessee, which I had to buy about 10 an \$80 book to pass that test. Had about three 11 electrical tests on that, and a lot on business tests to 12 pass that certification. I don't do it because I'm not 13 equipped to handle that. Like in Nashville, Tennessee 14 it's called Nashville Electric Company. Down here it's 15 called AEP. Then they got San Francisco Electric, and 16 NEC Electric Company is down there. They handle that. 17 They're equipped for it. 18 Q. Right. And I understand there's probably 19 bucket trucks and other equipment and things like that 20 that you would need to do that, but are you certified to 21 do that type of work? 22 A. Yes. 23 Q. And who -- what -- what sort of certifications 24 specifically do you have that are relevant to -- to that 25 kind of work?</p>	<p style="text-align: right;">Page 20</p> <p>1 number of years? 2 A. Yes. 3 Q. And did you -- did you also before this, did 4 you do some work on Mr. Cude's -- the house that burned 5 down? And I'm talking about the house that was located 6 at 1110 Vista Town Lane. Are you familiar with that 7 residence? 8 A. Yes, I built the -- we did his service on his 9 house, new meter, all new wiring. 10 Q. Okay. And what -- when -- when was that? Do 11 you remember? 12 A. I can't recall right offhand. It's been 13 numerous years ago. It's 2011. 14 Q. Okay. And can you -- can you tell us what you 15 did, what electrical work you did on the house? 16 A. I tore his old panel box, meter, everything 17 off the wall that he had built. I put a brand new panel 18 box, all brand new breakers, brand new 200-amp main 19 breaker in the -- which can work for a panel box. I put 20 new -- a new meter, new conductors going up through the 21 weatherhead, and from the meter box back into Walt's -- 22 his panel box, it's all brand new. 23 Q. And I'm going to pop up on the screen here for 24 you what I've marked as Exhibit 2. Have you seen -- 25 have you seen this picture before?</p>

<p>Page 21</p> <p>1 A. Yes.</p> <p>2 Q. I'll represent this is -- this is something</p> <p>3 that Mr. Cude provided to us.</p> <p>4 A. It's upside-down.</p> <p>5 Q. So it is. Hold on one second. Let me see if</p> <p>6 I can -- let me see if I can fix that. I bet I can do</p> <p>7 that if you give me one second.</p> <p>8 Okay. Let's try that again. That does</p> <p>9 look better. Okay. So you were saying this is the --</p> <p>10 this is the panel box on Mr. Cude's house?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And is this after -- after you had</p> <p>13 finished your work on the house?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. Tell us, is there a -- tell us about</p> <p>16 what's in here. You replaced -- and you may have said</p> <p>17 this already, but you replaced the main breaker -- the</p> <p>18 breakers and -- was there also maybe a surge protector</p> <p>19 in there?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Can you just tell the jury real quick</p> <p>22 what -- I'm sorry, I think -- I think you did, but --</p> <p>23 A. The top -- top breaker, that's your main</p> <p>24 breaker. That's a 200-amp main breaker. The wires that</p> <p>25 are feeding that, there's two ought conductors. The</p>	<p>Page 23</p> <p>1 conductor, a number 6/3 with ground, loaded into</p> <p>2 Mr. Cude's work area, and I mounted another subpanel,</p> <p>3 which is called no-nee (ph.). I had added a couple</p> <p>4 receptacles where he could plug in some of his tools,</p> <p>5 and I also wired up an air compressor.</p> <p>6 Q. Okay. Tell us about -- so there was a --</p> <p>7 there was a -- a second subpanel in -- in Mr. Cude's</p> <p>8 work area?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Can you tell us about that?</p> <p>11 A. That's a 125-amp panel. I brought number 6</p> <p>12 wire to it and that's good for 60 amps. And I brought</p> <p>13 that -- that main for that was coming out of this panel,</p> <p>14 and that was protecting the conductors and everything in</p> <p>15 that panel.</p> <p>16 Q. Okay. Any other work you did on -- on the</p> <p>17 wiring?</p> <p>18 A. That pretty much sizes it up.</p> <p>19 Q. Did you mention -- and -- and you may have</p> <p>20 mentioned this already, but did you -- did you do</p> <p>21 anything with the -- the weatherhead, the service that</p> <p>22 was coming into the house?</p> <p>23 A. I replaced all that.</p> <p>24 Q. Okay. And when you say replaced all that, you</p> <p>25 didn't replace the -- the -- the -- the drop line or the</p>
<p>Page 22</p> <p>1 neutral wire, which goes back to the meter also, that's</p> <p>2 a one-ought conductor. The rest of the branch circuits</p> <p>3 that goes throughout the house, some of them's on 20s,</p> <p>4 single-pole 20s, some of them are two-pole 30s, and some</p> <p>5 of them are two-pole 50s.</p> <p>6 Q. Okay. Do you believe this fairly and</p> <p>7 accurately represents the photograph -- and I know you</p> <p>8 didn't take it -- but do you think it fairly and</p> <p>9 accurately represents the work that you did, what was</p> <p>10 there after you did the installation and what was there,</p> <p>11 you know, after -- at the time of the fire, the</p> <p>12 incident?</p> <p>13 A. Well, this is how it looked after I got done</p> <p>14 with it.</p> <p>15 Q. Okay. Did you go back and inspect it after</p> <p>16 2011?</p> <p>17 A. No, there was no reason to.</p> <p>18 Q. Okay. And do you know -- you're not aware of</p> <p>19 anybody else who did any work after 2011, are you?</p> <p>20 A. No.</p> <p>21 Q. Okay. Did you inspect or did you replace, did</p> <p>22 you do any work on the rest of the wiring in the rest of</p> <p>23 the house?</p> <p>24 A. I went through and changed out some</p> <p>25 receptacles and some switches. I added another</p>	<p>Page 24</p> <p>1 AEP wires.</p> <p>2 A. AEP -- AEP does that.</p> <p>3 Q. Right. Can you just explain a little bit for</p> <p>4 the jury what -- what you placed, what specifically you</p> <p>5 worked on with relation to the weatherhead?</p> <p>6 A. Out of the top -- out of the top of this meter</p> <p>7 box I've got a two-inch conduit that goes up. It's got</p> <p>8 to be at least approximately 10 foot off the ground. I</p> <p>9 scraped it in three places, 12 inches to the</p> <p>10 weatherhead, one in the middle, one close to the meter</p> <p>11 head. I put a new weatherhead. That's where the</p> <p>12 conductors of that riser, the one that's called out,</p> <p>13 then the power company hooks it up.</p> <p>14 Q. Okay. And for the jury who may not know it,</p> <p>15 weatherhead is -- what is it?</p> <p>16 A. It's kind -- it's kind of when the wires come</p> <p>17 out of that conduit, the weatherhead fits over that</p> <p>18 pipe, and it's got -- you've got to poke some holes in</p> <p>19 the sides of that weatherhead, and you bring your</p> <p>20 conductors out on that and it's got a cover that fits</p> <p>21 over that. It keeps water from going down into the</p> <p>22 meter.</p> <p>23 Q. Okay. And so if I can summarize, you -- did</p> <p>24 you replace the wires going up into the weatherhead?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 25</p> <p>1 Q. Okay. And then A -- AEP would have connected</p> <p>2 the wires from the service pole to the weatherhead; is</p> <p>3 that --</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Do you know who did that at AEP?</p> <p>6 A. Not offhand. I wasn't there when they did it.</p> <p>7 Q. Okay. Do you know who was there?</p> <p>8 A. I have no idea.</p> <p>9 Q. I may have read somewhere, either in your --</p> <p>10 your expert report on this case or -- or somewhere else,</p> <p>11 but was there -- why did you replace the -- the wires</p> <p>12 that were running from the -- from the AEP service</p> <p>13 connection down into the weatherhead?</p> <p>14 A. They was all corroded, insulation coming off</p> <p>15 the conductors, which was a hazard. I replaced all</p> <p>16 that, put all brand new wire back in there so there</p> <p>17 wouldn't be no kind of problems whatsoever. That come</p> <p>18 right from the factory.</p> <p>19 Q. Okay. And when you say the -- the insulation,</p> <p>20 can you explain a little bit jury -- to the jury what --</p> <p>21 what you mean by insulation?</p> <p>22 A. The insulation was -- covers about -- it's the</p> <p>23 outside coating of the conductor itself, the copper.</p> <p>24 Q. Okay. So in -- I've got up on the screen the</p> <p>25 picture of the box still. You've got wires coming down</p>	<p style="text-align: right;">Page 27</p> <p>1 everything, but did you --</p> <p>2 A. No. No, I didn't.</p> <p>3 Q. Why don't you tell us what you did. That</p> <p>4 might be easier.</p> <p>5 A. I added some new receptacles replaced,</p> <p>6 replaced some single-post switches that runs his lights</p> <p>7 in his house.</p> <p>8 Q. Okay.</p> <p>9 A. I hooked up his vent-a-hood. I believe that's</p> <p>10 what it was. I hooked up his -- he got a new stove. I</p> <p>11 hooked that up. And that's pretty much the size of it.</p> <p>12 Q. Okay. Did you -- did you inspect most of the</p> <p>13 receptacles and wiring, at least what was visible, in</p> <p>14 the house?</p> <p>15 A. Yes.</p> <p>16 Q. Were any issues -- is that a fair statement?</p> <p>17 A. We just blocked the receptacles up. They was</p> <p>18 old. Some of them didn't have a grounding ground, where</p> <p>19 most receptacles nowadays you got to have a hot wire, a</p> <p>20 neutral wire, and you've got a ground wire. Some of</p> <p>21 them was just had -- was just a hot and neutral. We</p> <p>22 brought them up to date. The way you can get around</p> <p>23 without having a ground, you can have a GFI on the --</p> <p>24 wherever the power source is coming into a residence,</p> <p>25 any kind of establishment, and a GFI will handle that</p>
<p style="text-align: right;">Page 26</p> <p>1 from the top. That would be the weatherhead, correct?</p> <p>2 Is the insulation -- are those the white wires, or which</p> <p>3 ones -- which ones would be the -- the new wires coming</p> <p>4 in from the weatherhead?</p> <p>5 A. The ones that are coming through the meter at</p> <p>6 the bottom, it's got a short nipple, and you see it's</p> <p>7 got a blue bushing on it. Those are the wires that's</p> <p>8 coming from the meter that's feeding up to that top</p> <p>9 breaker. Those other wires are branch service.</p> <p>10 Q. Okay. And so the insulation is the plastic</p> <p>11 stuff around the wire, the white stuff that you can see?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. And -- and before you did the work --</p> <p>14 you didn't take any pictures of the work you did, did</p> <p>15 you?</p> <p>16 A. I didn't. I think Walt Cude took a picture of</p> <p>17 this.</p> <p>18 Q. Yeah, that's -- that's my understanding as</p> <p>19 well.</p> <p>20 What was your -- after you got done with</p> <p>21 the work, did you -- did you inspect all the electrical</p> <p>22 wires in the house?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And -- and maybe I should be a bit more</p> <p>25 specific. I imagine you didn't open up the walls and</p>	<p style="text-align: right;">Page 28</p> <p>1 pole without a ground.</p> <p>2 Q. Okay. So -- so by the time you were finished,</p> <p>3 all the outlets were actually grounded, not just the GF</p> <p>4 -- GFI, but were actually grounded?</p> <p>5 A. It was grounded. It's going through the main</p> <p>6 power that's feeding some receptacles. It was feeding</p> <p>7 into the GFI receptacle first. Then it branched off and</p> <p>8 hit a few more receptacles. The GFI was -- was hard</p> <p>9 without a fuse. I had an issue with any of -- any of</p> <p>10 those other receptacles, that GFI was the trip.</p> <p>11 Q. Okay. And did you also install -- I'm not</p> <p>12 sure you mentioned before, but did you also install new</p> <p>13 grounds for the residence?</p> <p>14 A. I installed the main ground, yes.</p> <p>15 Q. Okay. And so by the time you finished your</p> <p>16 work, the residence was fully grounded, code compliant?</p> <p>17 Would you --</p> <p>18 A. Yes. It was up to standards of the National</p> <p>19 Electric Code. The green wire you see in that box,</p> <p>20 that's the grounding wire that's feeding into the meter</p> <p>21 box.</p> <p>22 Q. And that goes -- what kind of -- what kind of</p> <p>23 ground did you install?</p> <p>24 A. That's a number 4 ground; THHN is the outside</p> <p>25 installation.</p>

<p style="text-align: right;">Page 29</p> <p>1 Q. And where does that wire go? Does it go to --</p> <p>2 A. It goes into the meter. And you've got</p> <p>3 another number 4 wire that goes down to a piece of</p> <p>4 conduit, and it goes -- you have a ground clamp and it</p> <p>5 clamps onto the ground rod itself. It's a five-eighths</p> <p>6 by eight-foot ground rod, which that ground rod is only</p> <p>7 good for another 6-wire, or 60 amps is all that ground</p> <p>8 rod is good for.</p> <p>9 Q. Okay. And the part -- and so that -- how big</p> <p>10 is the ground -- ground rod? Can you explain what the</p> <p>11 ground rod is just a little bit?</p> <p>12 A. It's a five-eighths ground rod. Eight foot</p> <p>13 deep is what is required. You install it in the ground.</p> <p>14 And you can have maybe a couple of inches just above the</p> <p>15 ground, but they pretty much want it ground level.</p> <p>16 Q. Okay. And so what was your general opinion,</p> <p>17 then, as a -- as a certified master electrician and</p> <p>18 electrical engineer at the state of the wiring,</p> <p>19 electrical wiring, electrical system in Mr. Cude's house</p> <p>20 after you finished your work?</p> <p>21 A. Looked like it was right up to date to the --</p> <p>22 that's the NEC, National Electric Code standards.</p> <p>23 Q. Okay. And you weren't -- any -- any remaining</p> <p>24 issues that you saw with the -- the electrical system in</p> <p>25 his house, Mr. Cude's house?</p>	<p style="text-align: right;">Page 31</p> <p>1 Q. Okay. And this might give you a -- a marker</p> <p>2 which you can remember at any time. Do you remember</p> <p>3 that there was a -- a hurricane that came through,</p> <p>4 hurricane Harvey in 2017?</p> <p>5 A. Yes.</p> <p>6 Q. And -- and so hurricane Harvey, do you</p> <p>7 remember how -- how long after hurricane Harvey the fire</p> <p>8 occurred?</p> <p>9 A. I'm not sure right off the bat when that storm</p> <p>10 come through. It's been a few years ago.</p> <p>11 Q. Yeah, I understand it's been a few years, but</p> <p>12 do you remember -- between the -- from the storm and</p> <p>13 the -- and the -- and the hurricane, do you remember how</p> <p>14 many years was there or how many months?</p> <p>15 MR. SWALLOW: Let's -- guys, can we just</p> <p>16 take a break real quick? I need to go off the record</p> <p>17 for something.</p> <p>18 MR. SCHAUER: Okay.</p> <p>19 THE VIDEOGRAPHER: The time is 10:40 a.m.</p> <p>20 We are now off the record.</p> <p>21 (Break from 10:40 to 10:41 a.m.)</p> <p>22 THE VIDEOGRAPHER: The time is 10:41 a.m.</p> <p>23 We are now on the record.</p> <p>24 Q. (BY MR. SWALLOW) Mr. Winkfein, do you recall</p> <p>25 how, generally, with -- within a period of months,</p>
<p style="text-align: right;">Page 30</p> <p>1 A. No, I didn't.</p> <p>2 Q. Okay. Did you -- now, I asked before. You</p> <p>3 were friends with Mr. Cude. I imagine after you</p> <p>4 finished the wiring back in 2011, did y'all see each</p> <p>5 other socially at least after that?</p> <p>6 A. Sure.</p> <p>7 Q. Okay. Would you have had occasion to visit</p> <p>8 Mr. Cude's residence after that?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And were you generally familiar</p> <p>11 with what -- what kind of -- with Mr. -- with Mr. Cude's</p> <p>12 shop, for example, with what -- you know, with his air</p> <p>13 conditioner, heater, that sort of stuff, the things that</p> <p>14 he had in his house?</p> <p>15 A. Yes, I could -- I knew about what he had in</p> <p>16 his house.</p> <p>17 Q. Okay. And when -- when would have been the</p> <p>18 last time prior to the fire -- do you remember the date</p> <p>19 of the fire? Why don't we establish that.</p> <p>20 A. I think that was 2011.</p> <p>21 Q. The fire? I think the wiring was 2011. Do</p> <p>22 you remember when the fire occurred? Let me -- let me</p> <p>23 -- sorry. I believe it was November 19th, 2017. Does</p> <p>24 that sound familiar?</p> <p>25 A. That sounds correct.</p>	<p style="text-align: right;">Page 32</p> <p>1 maybe, how -- how long after hurricane Harvey that the</p> <p>2 fire at Mr. Cude's residence occurred?</p> <p>3 A. I can't tell you right offhand. I don't keep</p> <p>4 up with dates too much anymore. Getting too old to keep</p> <p>5 up with yesterday.</p> <p>6 Q. I understand. That's -- that's fair. Can you</p> <p>7 tell -- was it a period of months, a period of years? I</p> <p>8 mean, can you generally, can you tell us?</p> <p>9 A. I would say it's a period of months.</p> <p>10 Q. Okay. All right. And so we'll leave it at</p> <p>11 that.</p> <p>12 And I think I asked you, but let's --</p> <p>13 let's -- let me just follow up on it. Before the --</p> <p>14 before the fire you had visited Mr. Cude's residence.</p> <p>15 Do you remember when -- when that occurred, the last</p> <p>16 time maybe you visited over there?</p> <p>17 A. It was around hurricane Harvey. I was there</p> <p>18 then. I was there several times after that.</p> <p>19 Q. Okay. So in the period between hurricane</p> <p>20 Harvey and when the fire occurred, you had been at the</p> <p>21 house several times. How often did you go over there?</p> <p>22 Once a week? Once a month? Any --</p> <p>23 A. I would say probably once a month.</p> <p>24 Q. Okay. All right. Now, I know he had -- I</p> <p>25 mean, and based on that, did you see anything that</p>

<p style="text-align: right;">Page 33</p> <p>1 concerned you about, you know, what -- what he was doing</p> <p>2 as it relates to the electrical system?</p> <p>3 A. He wasn't doing anything related to the</p> <p>4 electrical system.</p> <p>5 Q. Okay. And not that he was doing work on it,</p> <p>6 but let's talk about the shop area, for example. Did he</p> <p>7 have any equipment hooked up in the shop area that</p> <p>8 concerned you?</p> <p>9 A. He had an air compressor hooked up.</p> <p>10 Q. Okay. Did he --</p> <p>11 A. That was all that was hooked up in that -- his</p> <p>12 work area at that time. That was protected by a</p> <p>13 breaker.</p> <p>14 Q. How about with regards to his -- his -- his</p> <p>15 heater or any -- any other appliances in the house,</p> <p>16 anything that concerned you?</p> <p>17 A. No.</p> <p>18 Q. Okay. Can you -- can you just briefly explain</p> <p>19 for the jury in -- in simple terms, if you can, how does</p> <p>20 an electrical distribution system work?</p> <p>21 A. Well, it originates out of the -- well,</p> <p>22 actually it originates out of a power plant. And that</p> <p>23 -- those conductors are transmitted to substations that</p> <p>24 branches off, and just like this panel box, it branches</p> <p>25 off and goes to different areas of the -- the country or</p>	<p style="text-align: right;">Page 35</p> <p>1 A. It's not the main, no.</p> <p>2 Q. Okay. So it comes out at 7200 volts. And</p> <p>3 then from there what happens? What is the -- what's --</p> <p>4 A. It goes to transformers around the area and</p> <p>5 then the transformers reduce the voltage to go to a</p> <p>6 particular residence or a commercial establishment.</p> <p>7 Q. Okay. And explain -- explain to us, if you</p> <p>8 would, explain to the jury what -- what the -- what a</p> <p>9 transformer does.</p> <p>10 A. It reduces the voltage. In this particular</p> <p>11 case you have a 7200-volts, which is the line side, the</p> <p>12 primary side. It's got copper windings on the inside.</p> <p>13 And on this, it reduces it down to 120 -- or 240 or 120</p> <p>14 so you're neutral. Some -- some of them are -- might be</p> <p>15 12,000 volts, and some of them you'll come down and</p> <p>16 reduce it down to 480 volts.</p> <p>17 Q. And is -- is a transformer an -- an important</p> <p>18 piece of equipment in the distribution system?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Very -- very important piece of</p> <p>21 equipment?</p> <p>22 A. Very important.</p> <p>23 Q. Okay. And -- and explain that a little bit to</p> <p>24 us. How does -- does it help protect the residence?</p> <p>25 What -- what are -- what all functions does it perform?</p>
<p style="text-align: right;">Page 34</p> <p>1 the city, what have you. That's basically how that</p> <p>2 works.</p> <p>3 Q. Okay. And -- and maybe we can start from</p> <p>4 the -- are you familiar with the substation for the</p> <p>5 Arrowhead subdivision?</p> <p>6 A. I know where it's at. I've never done no work</p> <p>7 there.</p> <p>8 Q. You've seen it, though.</p> <p>9 A. Yes.</p> <p>10 Q. Okay. How far is that from Mr. --</p> <p>11 A. It's probably about 13 miles.</p> <p>12 Q. And so the -- do you know the -- what voltage</p> <p>13 comes out of the substation?</p> <p>14 A. It varies. Most of the conductors that feeds</p> <p>15 residential usually is 7200-volt line on the primary</p> <p>16 side.</p> <p>17 Q. Okay. And so the -- what we -- from the</p> <p>18 substation -- what does a substation look like? I may</p> <p>19 actually have a picture of it here, but tell --</p> <p>20 generally, what is a substation, what does it do?</p> <p>21 A. It just brings the power from a power plant,</p> <p>22 it gets distributed throughout the -- the area.</p> <p>23 Q. Okay. And so the -- the -- the power comes</p> <p>24 out of the substation. Does it come out at a reduced</p> <p>25 voltage? It's not the main transmission line, is it?</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Well, you got your primary side that goes in.</p> <p>2 You got one hot wire, feeds on the top of that</p> <p>3 transformer. And you've got a ground dead conductor on</p> <p>4 the other side of that transformer that reduces it to</p> <p>5 the windings that goes down in this case, 240 volt or</p> <p>6 120 to ground.</p> <p>7 Q. Okay. And I'm going to pull up an</p> <p>8 illustration here. And this has been marked as Exhibit</p> <p>9 25, I believe. And this is -- it's called What's On an</p> <p>10 Electric Power Pole, and I'll represent to you I believe</p> <p>11 this came off the Internet. But do you think this is a</p> <p>12 fair and accurate representation of generally what's on</p> <p>13 a -- a residential area power pole?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And there's a -- there's a few</p> <p>16 components here. We talked about the transformer. What</p> <p>17 else -- what else is generally on an electrical power</p> <p>18 pole that's -- that's important?</p> <p>19 A. Normally you have the lightning arrestor, then</p> <p>20 you've got a cutoff which has got a --</p> <p>21 THE REPORTER: Would you repeat that</p> <p>22 whole answer? Normally you have a what?</p> <p>23 A. You'll have a lightning protector and you'll</p> <p>24 have a -- what's called a cutout, and you'll have -- it</p> <p>25 will be fused on the inside of that cutout.</p>

<p style="text-align: right;">Page 37</p> <p>1 THE REPORTER: Thank you.</p> <p>2 Q. (BY MR. SWALLOW) And I'm going to zoom in</p> <p>3 here, if I can, for the jury. And this says -- we're</p> <p>4 looking up at the top of the power pole here. Can</p> <p>5 you -- can you read -- what does -- what does it say</p> <p>6 about cutouts? Can you read that?</p> <p>7 A. You've got to keep close -- I can't see it.</p> <p>8 Q. I got it, up closer. Yes, sir. Let's see if</p> <p>9 I can get it in a little bit closer for you. Well, hold</p> <p>10 on one second there. I've got to scroll over. There we</p> <p>11 go. There you go. Can you read that?</p> <p>12 A. Yes. Cutouts act like a fuse and open when</p> <p>13 there's a problem with a line or a section of it.</p> <p>14 Q. Okay. Would you generally agree with that?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Is a cutout something that's important</p> <p>17 to have generally on a -- on a power pole for a</p> <p>18 residence?</p> <p>19 A. All -- all establishments should have those.</p> <p>20 Q. In fact, is there a code provision that</p> <p>21 requires that?</p> <p>22 A. Well, it's -- well, it's protecting that</p> <p>23 transformer and it's protecting a line for the lineman</p> <p>24 that works on it. He uses what's called a hot stick and</p> <p>25 he can open that up and he can work on a transformer if</p>	<p style="text-align: right;">Page 39</p> <p>1 that. It's also bonded to the neutral conductor, or the</p> <p>2 grounded conductor, and it goes down the pole and it</p> <p>3 comes down and it's supposed to go into an 8-foot -- or</p> <p>4 excuse me, five-eighths by 10-foot ground rod, which is</p> <p>5 normally supposed to be about three foot from the pole.</p> <p>6 Q. Is that an important item as well in the -- in</p> <p>7 the system?</p> <p>8 A. Yes, it takes -- if you have any fault in</p> <p>9 that -- that unit right there, it's supposed to take any</p> <p>10 kind of fault to ground.</p> <p>11 Q. Okay. Would that be faults on the supply side</p> <p>12 as well as the residential side, or -- or how does that</p> <p>13 work?</p> <p>14 A. It will work on that primary side.</p> <p>15 Q. Okay. Can you -- can you explain a little bit</p> <p>16 about what -- what is it, a self-protected system? Was</p> <p>17 this a self-protected system?</p> <p>18 A. The one that Walt had was not. It did not</p> <p>19 have a cutout on it.</p> <p>20 Q. When you say the one that Walt had, you're</p> <p>21 referring to his residence at Vista -- Vista Lane where</p> <p>22 the fire occurred?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. And you're saying the -- the</p> <p>25 transformer did not have a -- a cutout on it?</p>
<p style="text-align: right;">Page 38</p> <p>1 it's faulty.</p> <p>2 Q. Okay. How about in a case of a fire? If</p> <p>3 there's a fire at somebody's residence, does that also</p> <p>4 give the -- the firemen --</p> <p>5 A. Yes. What that would do, the power company</p> <p>6 would use what's called a hotstick, it's fiberglass,</p> <p>7 they'll pull that cutout loose. That -- that takes --</p> <p>8 it cuts all the power going to that transformer and it</p> <p>9 cuts the power going to the residence off.</p> <p>10 Q. Okay. So if there was a fire at a residence,</p> <p>11 that would be something that would be useful for the</p> <p>12 firemen and the -- the electrical company?</p> <p>13 A. Electric company normally does that.</p> <p>14 Q. Can a fireman also do that? Do they have a</p> <p>15 hotstick?</p> <p>16 A. No, they don't normally carry those.</p> <p>17 Q. Okay. So we talked about the lightning</p> <p>18 arrestor, the transformer, the -- the cutout. What else</p> <p>19 -- what other important parts are there on a power pole?</p> <p>20 A. That's pretty much it.</p> <p>21 Q. How about the ground? Is -- is there a ground</p> <p>22 on those power poles?</p> <p>23 A. Yes, you got a ground rod or ground wire,</p> <p>24 which is supposed to be a number 6 ground. It feeds</p> <p>25 from that transformer, it's bonded to the housing of</p>	<p style="text-align: right;">Page 40</p> <p>1 A. No, sir. And on top of that, it had a</p> <p>2 nameplate on it that shows an internal -- internal fuse</p> <p>3 on the line side and a -- a breaker on the secondary</p> <p>4 side. The secondary side is the one that feeds into his</p> <p>5 house.</p> <p>6 Q. Okay.</p> <p>7 A. Apparently those did not work. What happened</p> <p>8 over at Walt Cude's house, you had a surge and there was</p> <p>9 no way to cut it out. It just kept coming. If you</p> <p>10 have, like, a lightning storm -- that's for an</p> <p>11 instance -- it hits your service, it will go to ground</p> <p>12 and it'll trip the main breaker. You have a surge in a</p> <p>13 transformer, say, for instance, which that happens</p> <p>14 occasionally around all areas. It will go to ground and</p> <p>15 trip that main breaker off. And it's over with in an</p> <p>16 instant.</p> <p>17 In this particular moment here, he had a</p> <p>18 constant power. That's not made -- these are not made</p> <p>19 for that -- for a constant current going through that.</p> <p>20 They're not designed for that, not the panel box or that</p> <p>21 transformer. That should have tripped and cut the power</p> <p>22 down.</p> <p>23 Q. Okay. Is -- and I just want to go back to my</p> <p>24 question about the self-protected -- self-protected</p> <p>25 system. This was something -- and I don't know if it</p>

<p style="text-align: right;">Page 41</p> <p>1 was in your report or maybe it was something you had</p> <p>2 mentioned to me -- but it seemed important, that this</p> <p>3 being a self-protected system, is that -- is that what</p> <p>4 this system was or was supposed to be?</p> <p>5 A. That's what it's -- according to the nameplate</p> <p>6 on the transformer, that's what it was.</p> <p>7 Q. Okay. And was it, based on what you have</p> <p>8 observed?</p> <p>9 A. Well, it didn't work.</p> <p>10 Q. Okay. And that's based on the observation of</p> <p>11 what -- what occurred?</p> <p>12 A. Right.</p> <p>13 Q. There was -- there was something else that I</p> <p>14 think you mentioned to me earlier about a grounded</p> <p>15 versus a grounding system, and -- and I don't know</p> <p>16 whether that's significant or not, but can you explain a</p> <p>17 little bit to the jury. What -- what is that? What's</p> <p>18 the difference between those two type of systems and how</p> <p>19 does that --</p> <p>20 A. All systems got it. You got a grounding</p> <p>21 conductor, which is also called a neutral, or a grounded</p> <p>22 conductor, rather. Then you've got a grounding</p> <p>23 conductor. The grounding conductor is the one that goes</p> <p>24 to the ground onto the ground rod. If you have any kind</p> <p>25 of faults, it's supposed to go directly to ground. That</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. And that goes into a ground rod in the ground.</p> <p>2 And there's a separate -- there's a separate ground or</p> <p>3 what's called a -- a neutral wire, I believe?</p> <p>4 A. Yes, sir. That's a grounded conductor.</p> <p>5 That's a return.</p> <p>6 Q. Okay.</p> <p>7 A. You've got all AC current, goes around and</p> <p>8 around.</p> <p>9 Q. And where does that -- where does that wire go</p> <p>10 back to? There's an -- and the neutral wire -- can you</p> <p>11 explain a little bit to the jury on that -- on that</p> <p>12 illustration -- let me pull the illustration back up</p> <p>13 there. There's three -- three wires, I believe, at the</p> <p>14 -- at the top of -- at the top of the -- at the top of</p> <p>15 the power pole. Which one is the -- the neutral or the</p> <p>16 grounding conductor? And I'm going to get you a picture</p> <p>17 here of Mr. Cude's system as well. But can you explain</p> <p>18 that to the jury from the -- from the illustration up</p> <p>19 there?</p> <p>20 A. You've got three wires. That could be three</p> <p>21 different circuits that could be feeding somewhere else</p> <p>22 down the line. You only need one.</p> <p>23 Q. Okay. Well, let me -- let me get you --</p> <p>24 there -- there you go. Here's a picture of Mr. Cude's</p> <p>25 residence. Is this -- are you -- are you familiar with</p>
<p style="text-align: right;">Page 42</p> <p>1 takes all the fault off the current.</p> <p>2 Q. Okay. And what kind of system are we dealing</p> <p>3 with here? Was it both or is --</p> <p>4 A. There's both -- you have -- you've got a</p> <p>5 grounded -- grounded conductor going -- feeding on the</p> <p>6 primary side of that fence coming from an AEP, and you</p> <p>7 got your main power which is 7200 volts. Then on the</p> <p>8 secondary side you've got 240 volts and 120 to ground.</p> <p>9 Q. Okay. And is there -- do you -- do you</p> <p>10 believe there was a -- where do you think the fault was</p> <p>11 in this system?</p> <p>12 A. I think it was in the pipe triplex, which</p> <p>13 those are the conductors that are twisted together</p> <p>14 feeding into Walt's house.</p> <p>15 Q. Okay. Does that happen -- does that relate to</p> <p>16 the grounding versus the grounded conductor?</p> <p>17 A. They was all connected together. They -- that</p> <p>18 started on the -- the conductors and it all bonded</p> <p>19 together, and you had a constant voltage. That</p> <p>20 transformer in Walt Cude's panel box is not designed for</p> <p>21 that kind of return.</p> <p>22 Q. Okay. And -- and let me see if I can pull</p> <p>23 this up. But there's a -- there's the ground that goes</p> <p>24 down the telephone -- down the telephone pole, correct?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 44</p> <p>1 Mr. Cude's residence and the transformer pole there?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. And if you can explain a little bit for</p> <p>4 the jury, what are we looking at here? Can you see the</p> <p>5 picture I've pulled up on the screen?</p> <p>6 A. I can.</p> <p>7 MR. SCHAUER: John, excuse me. Are --</p> <p>8 are you going to make this an exhibit so we can identify</p> <p>9 it later?</p> <p>10 MR. SWALLOW: I appreciate it, Don, thank</p> <p>11 you. Thank you for that.</p> <p>12 Q. (BY MR. SWALLOW) This is -- I believe it's</p> <p>13 Exhibit 19. All right. Can you -- can you explain what</p> <p>14 we're looking at here, Walt, on Exhibit 19?</p> <p>15 A. I'm Bill.</p> <p>16 Q. Thank you. Thank you. Thank you,</p> <p>17 Mr. Winkfein. Thank you, Bill. Can you --</p> <p>18 A. There's three conductors that are coming out</p> <p>19 of that transformer. Those are the secondary side of</p> <p>20 that transformer. The two on the outside are your hot</p> <p>21 wires. Each one of them is 120, two ground. Your</p> <p>22 middle one is your neutral wire, which is a grounded</p> <p>23 conductor. And those particular wires there, they're</p> <p>24 corroded. Insulation was falling off of it.</p> <p>25 Q. Okay. And is this -- is this -- is this the</p>

<p style="text-align: right;">Page 45</p> <p>1 transformer at Walt -- Walt Cude's -- or Walton Cude's</p> <p>2 residence, prior residence, at -- at the Vista Lane</p> <p>3 residence?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And if -- what are we looking at here?</p> <p>6 Is this -- we're looking towards Mr. Cude's residence</p> <p>7 and towards -- is that correct?</p> <p>8 A. I guess so. Yes.</p> <p>9 Q. Can you -- can you just explain for the jury,</p> <p>10 what -- where would Mr. Cude's residence have been on</p> <p>11 this?</p> <p>12 A. That far pole. It's feeding back into</p> <p>13 Mr. Cude's house.</p> <p>14 Q. Okay. And so we're looking -- I'm going to</p> <p>15 zoom in here on it a little bit. This power pole down</p> <p>16 the hill, that's -- that would have gone into Mr. Cude's</p> <p>17 residence?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. And -- and his service, I guess there</p> <p>20 would have been a service drop -- if I call that the</p> <p>21 service pole, is that all right?</p> <p>22 A. That's fine.</p> <p>23 Q. Okay. And so that would have been the service</p> <p>24 pole. So in this case it went from the transformer</p> <p>25 here, down to the service pole, and then there would</p>	<p style="text-align: right;">Page 47</p> <p>1 think you mentioned there was some -- looked like there</p> <p>2 was some corrosion, some issues on the -- the</p> <p>3 connections?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And is that -- you're talking about</p> <p>6 the -- the wire connections here to the -- the</p> <p>7 transformer?</p> <p>8 A. Yes, that's your secondary side.</p> <p>9 Q. Okay. And is this -- and this is Exhibit 20.</p> <p>10 This may be a closer up picture of it. And so I've</p> <p>11 pulled up Exhibit 20 on the screen. Is that -- is that</p> <p>12 a closer up picture of those connections?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Can you explain to the jury what --</p> <p>15 what we're looking at here?</p> <p>16 A. There are two wires on your outside, 120 volts</p> <p>17 apiece. Little wire is your grounding conductor. You</p> <p>18 go to where the meter, from one side your hotstick;</p> <p>19 grounded conductor, you'll have 120. You go to both</p> <p>20 sides of your two hots on the outside, you'll have 240</p> <p>21 volts. The stack that you got going into that</p> <p>22 transformer going to that neutral wire, or the grounded</p> <p>23 conductor, that's what's called a bonding jumper. Then</p> <p>24 you got a ground on the other side of that transformer</p> <p>25 which is coming up the pole was bonded to that</p>
<p style="text-align: right;">Page 46</p> <p>1 have been what's called a service drop; is that a</p> <p>2 correct --</p> <p>3 A. That -- that would be the one that's going to</p> <p>4 Walt Cude's house. That would be a service drop.</p> <p>5 Q. Okay. And so where -- where -- in this</p> <p>6 picture, where would Mr. Cude's been -- house have been</p> <p>7 in Exhibit 19?</p> <p>8 A. It would have been to the left of this pole</p> <p>9 with this transformer, back down below that.</p> <p>10 Q. And I think there's a -- it looks like there's</p> <p>11 a bit of a foundation or something behind that --</p> <p>12 A. That's what's left of it.</p> <p>13 Q. (Intelligible) would have been?</p> <p>14 THE REPORTER: You cut out. What was</p> <p>15 your question?</p> <p>16 Q. (BY MR. SWALLOW) Okay. I'm looking off to</p> <p>17 the left side of the picture, Mr. Winkfein. It looks</p> <p>18 like there's a foundation or a pad down there to the</p> <p>19 left behind that tree. Is that where Mr. Cude's</p> <p>20 residence was prior -- previously located?</p> <p>21 A. Correct.</p> <p>22 Q. Is there -- and -- and you can't see it real</p> <p>23 well in this picture, but is there a -- well, forget</p> <p>24 about that for now. Okay.</p> <p>25 Going back to the transformer here, I</p>	<p style="text-align: right;">Page 48</p> <p>1 transformer.</p> <p>2 Q. And so that ground -- both that -- that --</p> <p>3 that connection -- what was that -- what did you call</p> <p>4 the connection there, a --</p> <p>5 A. Bonding -- bonding jumper.</p> <p>6 Q. A bonding jumper, okay. And that -- that --</p> <p>7 that's an important piece of -- of the system as well?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And all these -- all these pieces have</p> <p>10 to work together; otherwise, you have a -- you can end</p> <p>11 up with a fault in the system and --</p> <p>12 A. You can.</p> <p>13 Q. All right. I want to go back to Exhibit 19</p> <p>14 real quick. And if you can, explain to the jury. I'm</p> <p>15 going to -- I want to zoom in on the bottom of the</p> <p>16 picture here a little bit. And down here at the</p> <p>17 bottom -- let me move this out of the way. There -- you</p> <p>18 can see these three wires. They connect. One</p> <p>19 connects -- you said there's the two hots, right, and</p> <p>20 then there's that middle -- middle wire. What does that</p> <p>21 connect to there?</p> <p>22 A. That's going to a grounding conductor --</p> <p>23 grounded conductor. That's a neutral wire rather.</p> <p>24 Q. The neutral wire. Can you explain to the jury</p> <p>25 what that does or where that goes?</p>

<p style="text-align: right;">Page 49</p> <p>1 A. That goes back to that pole and goes into Walt 2 Cude's home. 3 Q. Okay. Did that play -- in your opinion, did 4 that play a part in -- in -- in the -- the accident, the 5 incident, the fire? 6 A. That could've had a part of it, but the main 7 cause was the triplex feeding from that power pole going 8 into Walt Cude's house. That's where it actually 9 started. 10 Q. Okay. And we'll get to the triplex. 11 Is -- is -- it -- if that ground -- did 12 you call it grounding conductor, the -- the neutral 13 wire? 14 A. That was a grounded conductor. 15 Q. Grounded. 16 A. Grounding conductor is a ground that goes down 17 to ground to your ground rod. 18 Q. Okay. If the system's grounding conductor had 19 not been there or had been defective, would the grounded 20 conductor have protected the -- by itself, protected the 21 residence by itself? 22 A. No. 23 Q. So you need both of those systems to work 24 together? 25 A. Yes.</p>	<p style="text-align: right;">Page 51</p> <p>1 photograph here -- I know you didn't take the 2 photograph, you weren't able to get up on the pole. But 3 do you believe this fairly and accurately represents the 4 condition of the equipment at -- 5 A. Yeah. 6 Q. Okay. And how about the same goes for -- let 7 me -- let me go back to -- this -- that was Exhibit 19. 8 Let me see if I can put up -- well, Exhibit 20. Same 9 question for Exhibit 20: Do you believe that fairly and 10 accurately represents the condition of the equipment at 11 Walt Cude's house? 12 A. Yes. 13 Q. Okay. And I don't know if I asked you, but 14 Exhibit 20, is that -- is that the transformer that's 15 located at Walt -- Walton Cude's residence or former 16 residence on Vista Lane? 17 A. Yes. 18 Q. I want to go back to Exhibit 18. As part of 19 your investigation, did you also look at the ground wire 20 on the transformer pole? 21 A. Yes. It looked like it was all corroded up. 22 It was the wrong size -- 23 Q. Okay. 24 A. -- conductor. 25 Q. Can you tell the jury, is this -- is the</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. And why is that? 2 A. Your grounding conductor is a return. A 3 grounded conductor takes any kind of fault to ground. 4 Do you have any fault -- say, for instance, in your 5 house, you have a -- a coffeemaker. 6 Q. Yes, sir. 7 A. When that malfunctions, well, that's gone to a 8 breaker inside your panel box. When it malfunctions, 9 that goes to ground. It takes it back to the -- to 10 ground outside and it also trips the breaker where there 11 would be no more power going to that item. 12 Q. So if -- if -- if both of those -- if one of 13 those systems wasn't working, that -- that could have at 14 least contributed or caused the -- the incident, the 15 fire, in your opinion. 16 A. Yes. 17 Q. Okay. And I want to pull up real quickly -- 18 this is going to be Exhibit 18. And you know what? 19 Before I do that, hold on one second. 20 You're familiar with -- I think I asked 21 you this before, but you're familiar with Walton -- Walt 22 Cude's residence there, the former residence at Vista 23 Lane, correct? 24 A. Correct. 25 Q. Do -- do you believe this -- this -- this</p>	<p style="text-align: right;">Page 52</p> <p>1 ground wire on Walton Cude's transformer pole? 2 A. Yes. 3 Q. Okay. And -- and do you believe this 4 photograph, Exhibit 18, does that fairly and accurately 5 represent the condition of the ground wire as it exists? 6 A. Yes. 7 Q. Okay. How about at the time of the incident? 8 Do you -- had you observed the ground wire at the -- at 9 the time of the incident or shortly thereafter? 10 A. It was after. 11 Q. And how -- how long after? 12 A. It was probably a few days after the fire was 13 already out and we started looking around and we come 14 across that. 15 Q. Okay. But you believe that the photograph at 16 least -- does it -- does it accurately, fairly and 17 accurately represent the condition of the ground wire at 18 the time of the fire or shortly thereafter? 19 A. Yes, it was there. 20 Q. And this is -- and I brought -- I wanted to 21 bring this up right now. And we'll get back to -- we'll 22 get back to -- to talking about the -- the fire a little 23 bit later. But this is the grounding or grounded 24 conductor? This is -- can you select -- 25 A. This is the grounding conductor.</p>

Page 53

1 Q. Okay. So this is another -- this is that
 2 second ground or second -- second part of the system
 3 that's -- that's important?
 4 **A. Correct.**
 5 Q. Okay. And while we're here, you mentioned
 6 it's corroded. Anything else about the -- the ground
 7 wire that -- that you -- you thought was a problem?
 8 **A. Well, it should have been a number 4 wire,**
 9 **actually. Here's the difference. Here's a number 8**
 10 **wire and this is a number 4 gauge wire. AEP requires to**
 11 **have a number 4 gauge wire at a residence, but yet they**
 12 **not -- they don't use a number 4 gauge wire on theirs.**
 13 Q. Okay.
 14 **A. Can you tell the difference in the sizes?**
 15 Q. Can you hold that up to the camera so the jury
 16 can see that? A little bit higher, Mr. Winkfein. There
 17 you go. Okay.
 18 What's the -- what's the difference
 19 between a 4 -- those are a 4 and an 8?
 20 **A. Yes.**
 21 Q. Okay. And so which one was required? A
 22 little bit higher if you can. Which one was required to
 23 be on the pole?
 24 **A. It should have been a number 4 which is this**
 25 **one.**

Page 54

1 Q. Okay. And I'm just eyeballing it here, but it
 2 looks like a number 8 is about half the size of a number
 3 4?
 4 **A. Pretty much.**
 5 Q. Okay. And so the -- the wire that was on
 6 the -- on the AEP transformer pole, the one that you
 7 observed following the fire, following the incident,
 8 it --
 9 **A. It looked like this gauge right here.**
 10 Q. A number 4 -- 4 gauge. Okay. And in your
 11 opinion, that's inadequate.
 12 **A. That's inadequate.**
 13 Q. Okay. Any -- any other problems with that --
 14 with the ground wire? It looks it -- like it's
 15 corroded. You mentioned corrosion, it's too small.
 16 Anything else? It looks like it's almost caked there.
 17 Do you see that?
 18 **A. I have seen it. That's not good either.**
 19 Q. Okay.
 20 MR. SWALLOW: Okay. I think if y'all
 21 don't mind, can we take a quick break and we'll continue
 22 our -- our questioning, if you give me about five
 23 minutes? Does that work for everybody?
 24 **THE WITNESS: Sounds good to me.**
 25 MR. SCHAUER: Five minutes? Okay.

Page 55

1 MR. SWALLOW: About five minutes, yeah.
 2 THE VIDEOGRAPHER: Okay. The time is
 3 11:10 a.m. and we are now off the record.
 4 (Break from 11:10 to 11:20 a.m.)
 5 THE VIDEOGRAPHER: The time is 11:20 a.m.
 6 We are now on the record.
 7 Q. (BY MR. SWALLOW) Mr. Winkfein, we were
 8 looking at some pictures of transformers and we were
 9 talking about the -- the electrical transmission system
 10 for the -- for the Arrowhead neighborhood or for -- for
 11 a, you know, residential neighborhood in general.
 12 Who -- who is responsible for maintaining the electrical
 13 system?
 14 **A. AEP.**
 15 Q. And is that -- in this case, who is AEP?
 16 **A. American Electric.**
 17 Q. Are they -- yeah. And are they -- are they --
 18 are they what's referred to as the service provider or
 19 what --
 20 **A. Well, you can use different providers. You**
 21 **can use AEP as your provider, you can use TXU as a**
 22 **provider, but the one that maintains the lines is AEP.**
 23 Q. AEP is the -- the company that maintains the
 24 lines at the Arrowhead subdivision?
 25 **A. Correct.**

Page 56

1 Q. And AEP is the company responsible for -- that
 2 was responsible for maintaining the lines on Vista
 3 Lane --
 4 **A. Yes.**
 5 Q. -- at Walton Cude's residence?
 6 **A. Correct.**
 7 Q. Okay. Now, y'all -- you live in the Arrowhead
 8 subdivision. I understand that you -- you recently took
 9 a tour around the subdivision, looked at some of the
 10 installations there, some of the maintenance by AEP; is
 11 that correct?
 12 **A. Correct.**
 13 Q. Okay. I just want to talk about that a little
 14 bit, if you don't mind. I'm going to pop up on the
 15 screen here. It's been labeled Exhibit 3. And is
 16 this -- is this a picture that you took?
 17 **A. I don't take pictures. Walt -- Walt -- Walt**
 18 **took the pictures.**
 19 Q. I understand. Is this a picture that Walt
 20 took, then?
 21 **A. Yes.**
 22 Q. Okay. And were you with Walt when he took
 23 this picture?
 24 **A. Yes.**
 25 Q. Okay. And why did y'all take this picture?

<p style="text-align: right;">Page 57</p> <p>1 What -- what were y'all trying to show here?</p> <p>2 A. What we were trying to get at is how AEP does</p> <p>3 not maintain their equipment.</p> <p>4 Q. Okay. And is this what -- this is a -- a</p> <p>5 piece of AEP equipment here in Exhibit 3?</p> <p>6 A. Yes.</p> <p>7 Q. Is this -- where is this located?</p> <p>8 A. It's on Vista Drive. There's a lot of Vistas</p> <p>9 out here.</p> <p>10 Q. Are they -- how -- how far is it from</p> <p>11 Mr. Cude's residence?</p> <p>12 A. Probably a mile, if that much.</p> <p>13 Q. Okay. This would be the same general service,</p> <p>14 electrical service that -- that was servicing Mr. Cude's</p> <p>15 residence at the time of the fire?</p> <p>16 A. It could have been. You got -- like I said</p> <p>17 before, you've got branch circuits like in that panel</p> <p>18 box.</p> <p>19 Q. Uh-huh.</p> <p>20 A. Out of those substations, it's branched off to</p> <p>21 different areas. Because you can only use one wire for</p> <p>22 so many transformers. Then you've got to use another</p> <p>23 line. I don't know if this is the particular line</p> <p>24 feeding into Walt Cude's house or -- or not.</p> <p>25 Q. Okay. And generally, though, you think this</p>	<p style="text-align: right;">Page 59</p> <p>1 this. And let me see if I can find a picture of a</p> <p>2 transformer with a cutout. Here is another transformer.</p> <p>3 This is Exhibit 4. Is this another one</p> <p>4 of the pictures you took?</p> <p>5 A. Walt Cude took this picture.</p> <p>6 Q. Okay, sorry. Thank you. Is this another of</p> <p>7 the pictures that Walt took --</p> <p>8 A. Yes.</p> <p>9 Q. Okay. And were you with Walt when he took</p> <p>10 this picture?</p> <p>11 A. Yes.</p> <p>12 Q. Do you recall where this -- this picture was</p> <p>13 taken?</p> <p>14 A. It's around this area, within a mile radius.</p> <p>15 Q. All right. And does this picture -- in this</p> <p>16 case, does the transformer here have a cutout?</p> <p>17 A. Yes, it does.</p> <p>18 Q. Okay. For the cutout to function, does each</p> <p>19 individual residence have to have a cutout?</p> <p>20 A. Yes.</p> <p>21 Q. All right. Go ahead.</p> <p>22 A. On these transformers, they should all have</p> <p>23 cutouts on them.</p> <p>24 Q. Okay. Does this fairly -- does this</p> <p>25 photograph, Exhibit 4, fairly and accurately represent</p>
<p style="text-align: right;">Page 58</p> <p>1 fairly and accurately represents the -- you know, the</p> <p>2 condition of this transformer at least at the present</p> <p>3 time?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. How about at the time of the fire? I</p> <p>6 mean, is generally -- is the condition electrical</p> <p>7 system, the grid system in the Arrowhead subdivision,</p> <p>8 generally about the same as it was at the time of the</p> <p>9 fire?</p> <p>10 A. It's still the same.</p> <p>11 Q. Okay. And I have another question for you. I</p> <p>12 remember there was -- in AEP, in some of its discovery</p> <p>13 responses, they talked about a -- a cutout that was at</p> <p>14 Buffalo Street. Did y'all do any investigation on that?</p> <p>15 A. Some of the houses had cutouts, but some of</p> <p>16 them did not have cutouts.</p> <p>17 Q. Okay. And at the time of the -- at the time</p> <p>18 of the incident, was there a cutout for Mr. Cude's</p> <p>19 residence?</p> <p>20 A. No.</p> <p>21 Q. Okay. And there wouldn't have been a cutout</p> <p>22 anywhere on -- that you're aware of in this subdivision</p> <p>23 that would have cut out the power to his residence?</p> <p>24 A. No.</p> <p>25 Q. Okay. All right. So if -- and let me ask you</p>	<p style="text-align: right;">Page 60</p> <p>1 the condition of the -- the transformer and the -- the</p> <p>2 power lines here that -- that y'all observed?</p> <p>3 A. We observed those -- that particular</p> <p>4 transformer here is -- I'd say today it's all rusted</p> <p>5 with no rim. It should be replaced. That pole needs to</p> <p>6 be replaced, too. It looks like it's rotten also.</p> <p>7 Q. And here -- here -- this is Exhibit 5. This</p> <p>8 is another -- is this another one of the pictures that</p> <p>9 you and Mr. Cude took?</p> <p>10 A. Yes.</p> <p>11 Q. On -- in this case, does this fairly and</p> <p>12 accurately represent what y'all observed?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. And in this case, there's no -- am I</p> <p>15 correct in stating that there's no cutout?</p> <p>16 A. There's no cutout.</p> <p>17 Q. Okay. Any other observations on this</p> <p>18 photograph?</p> <p>19 A. The transformer's rusted to no end. It should</p> <p>20 have been -- should be replaced.</p> <p>21 Q. Is this an active service connection?</p> <p>22 A. Yes.</p> <p>23 Q. How about this one? This -- this is Exhibit</p> <p>24 6. Is this another picture y'all took in the Arrowhead</p> <p>25 subdivision?</p>

<p style="text-align: right;">Page 61</p> <p>1 A. Yes.</p> <p>2 Q. And does this fairly and accurately represent</p> <p>3 what you observed?</p> <p>4 A. Yes.</p> <p>5 Q. Any -- any comments on this? What were y'all</p> <p>6 trying to show with this picture?</p> <p>7 A. This transformer needs to be replaced. It is</p> <p>8 rusty, and AEP is supposed to take care of any kind of</p> <p>9 trees or bushes or anything that goes up around these</p> <p>10 poles. They're supposed to keep it clear from them, and</p> <p>11 they have not done that.</p> <p>12 Q. Okay. And again, this -- is this -- this is</p> <p>13 an active service connection?</p> <p>14 A. Yes.</p> <p>15 Q. How about this one here? Is this -- is this</p> <p>16 another picture that you and Walt took in the</p> <p>17 neighborhood?</p> <p>18 A. Yes.</p> <p>19 Q. Does this fairly and accurately represent what</p> <p>20 you observed?</p> <p>21 A. Yes.</p> <p>22 Q. And what -- what are we -- what are we looking</p> <p>23 at here?</p> <p>24 A. You've got another one rusty. The whole top</p> <p>25 of that transformer is about to come off. And that does</p>	<p style="text-align: right;">Page 63</p> <p>1 wanted to show an example of a service drop. And is</p> <p>2 this another picture that y'all took from -- around --</p> <p>3 Exhibit 10, around the Arrowhead subdivision?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. You think this fairly and accurately</p> <p>6 represents what you observed?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And what -- what are we looking at</p> <p>9 here?</p> <p>10 A. We've got too much play in that line. It's --</p> <p>11 excuse me -- it should be a little bit tighter up to</p> <p>12 that pole. It's drooping.</p> <p>13 THE REPORTER: Excuse me. Can you repeat</p> <p>14 that answer? "And what are we looking at here?"</p> <p>15 A. We're looking at triplex coming from AEP's</p> <p>16 pole.</p> <p>17 THE REPORTER: I'm sorry. I still didn't</p> <p>18 understand. "We're looking at five?"</p> <p>19 A. You're looking at a triplex. That's what</p> <p>20 these conductors are called. It's coming from AEP's</p> <p>21 power pole and it's feeding the residence. You've got</p> <p>22 too much droop in that line; you don't need that much.</p> <p>23 MR. SWALLOW: Okay. And -- and I think</p> <p>24 the term, Madam -- the court reporter referenced was --</p> <p>25 triplex? Is that the right way to pronounce that?</p>
<p style="text-align: right;">Page 62</p> <p>1 not have a cutout over that either.</p> <p>2 Q. Okay. And we're also missing a cutout. Okay.</p> <p>3 And this is Exhibit 7. I got a -- I</p> <p>4 think this -- Exhibit 8, is this the same as Exhibit 7,</p> <p>5 same -- same transformer, I mean?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Just a close-up of it. How about this</p> <p>8 one, is this -- this is Exhibit 9. Is this the same</p> <p>9 transformer as Exhibit 7 and 8?</p> <p>10 A. I think this is a different transformer.</p> <p>11 Q. This is a different one? Okay. And does this</p> <p>12 fairly and accurately represent what y'all observed out</p> <p>13 there?</p> <p>14 A. Correct.</p> <p>15 Q. And this is -- this is located also in the --</p> <p>16 in the Arrowhead subdivision?</p> <p>17 A. Correct.</p> <p>18 Q. And on -- is this -- is this another active</p> <p>19 service connection?</p> <p>20 A. Correct.</p> <p>21 Q. Now, before we talked a little bit -- this</p> <p>22 is -- I pulled up here Exhibit 10. Before we talked a</p> <p>23 little bit about a service drop and I didn't want to</p> <p>24 show the jury -- since we weren't able to see the -- the</p> <p>25 service drop for Walt's house because it's burnt down, I</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Yes.</p> <p>2 Q. And what -- what is triplex? Is this the --</p> <p>3 what you're talking about is the wire kind of in the</p> <p>4 middle of the picture here; is that what we're looking</p> <p>5 at?</p> <p>6 A. Yeah, correct.</p> <p>7 Q. Okay. And can you explain for the jury what</p> <p>8 triplex is?</p> <p>9 A. It's three conductors. You've got two</p> <p>10 insulated, which are your power conductors. The third</p> <p>11 one is the noninsulated conductor, which is your</p> <p>12 grounded conductor.</p> <p>13 Q. Okay. And this is the same -- same sort of</p> <p>14 connection that -- that Walton -- that Walt Cude would</p> <p>15 have had at his house over on Vista Lane?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you know where this was taken?</p> <p>18 A. It was just around our area.</p> <p>19 Q. All right. Was it in the Vista -- or the</p> <p>20 Arrowhead subdivision, though?</p> <p>21 A. Yes.</p> <p>22 Q. This one does not appear to have an exhibit</p> <p>23 number on it. I believe this is -- hold on a second.</p> <p>24 There we go. That one does. Exhibit 11. Is this</p> <p>25 another one of the pictures y'all took out by the</p>

<p>Page 65</p> <p>1 Arrowhead subdivision?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. Do you remember where this was located?</p> <p>4 A. Just around this area.</p> <p>5 Q. Okay. Somewhere near -- near Mr. Cude's</p> <p>6 house, though?</p> <p>7 A. Correct.</p> <p>8 Q. And what are we -- what did we observe here?</p> <p>9 What did you observe? Why did y'all take this picture?</p> <p>10 A. Well, the -- the braces for the line</p> <p>11 conductors, those are all rotten. The supports for it's</p> <p>12 all rotten. That pole is rotten. It's about to fall</p> <p>13 down.</p> <p>14 Q. Okay. There's actually some cutouts on this</p> <p>15 pole, right?</p> <p>16 A. We had to cut -- we had to cut the power off</p> <p>17 of that main line.</p> <p>18 Q. Those are actually cutouts for the main line,</p> <p>19 then.</p> <p>20 A. Yes.</p> <p>21 Q. Okay. Do you know -- do you know if there was</p> <p>22 any cutouts on the main line to Walt -- Walt Cude's</p> <p>23 residence at the fire?</p> <p>24 A. I did not see none.</p> <p>25 Q. Okay. So this would be another way, if there</p>	<p>Page 67</p> <p>1 MR. SWALLOW: I can do that, yes. Yeah,</p> <p>2 I'd be happy to do that. Yeah.</p> <p>3 THE REPORTER: Okay, great.</p> <p>4 MR. SWALLOW: I don't have to say it like</p> <p>5 that, but, yeah, I can make that happen. Sure. Let</p> <p>6 me -- let me hit save real quick. Okay. I can do that.</p> <p>7 THE REPORTER: Okay.</p> <p>8 Q. (BY MR. SWALLOW) I've got a couple more and</p> <p>9 then -- and then we'll move on here, Mr. Winkfein. I</p> <p>10 appreciate your patience, but is this another one of the</p> <p>11 pictures y'all -- y'all took?</p> <p>12 A. Yes.</p> <p>13 Q. And -- and do you remember where this one is</p> <p>14 located?</p> <p>15 A. Just around this area.</p> <p>16 Q. And this -- this one is Exhibit 12. What were</p> <p>17 you trying to show here?</p> <p>18 A. They're not -- AEP's not taking care of the</p> <p>19 conductors correctly. There should be no kind of growth</p> <p>20 whatsoever on these lines.</p> <p>21 Q. And this -- this fairly and accurately</p> <p>22 represents what y'all observed when -- the power lines?</p> <p>23 A. Yes.</p> <p>24 Q. I believe this is Exhibit 13. Can you tell us</p> <p>25 what we're looking at here?</p>
<p>Page 66</p> <p>1 was a fault in the system, that they could cut the</p> <p>2 power?</p> <p>3 A. Yes.</p> <p>4 Q. And the -- the -- for the jury here, the</p> <p>5 cutouts are these --</p> <p>6 MR. SWALLOW: Can I -- can I highlight on</p> <p>7 this, if I highlighted on this? Madam Court Reporter,</p> <p>8 if I highlight on this, is that okay?</p> <p>9 THE REPORTER: Yes.</p> <p>10 Q. (BY MR. SWALLOW) I'm going to draw three --</p> <p>11 just -- just -- maybe just one is enough. But do you</p> <p>12 see where I just drew a -- a circle around there?</p> <p>13 A. Yes.</p> <p>14 Q. Is that the cutout?</p> <p>15 A. Yes.</p> <p>16 Q. And there's -- there's another one up here?</p> <p>17 A. Right.</p> <p>18 Q. Okay. And then there's another one here. All</p> <p>19 right.</p> <p>20 Real quick, does this fairly and</p> <p>21 accurately represent what y'all observed?</p> <p>22 A. Yes.</p> <p>23 Q. And that...</p> <p>24 THE REPORTER: All right. Are you going</p> <p>25 to send that to me now with the circles on it?</p>	<p>Page 68</p> <p>1 A. You're looking at the insulation on your</p> <p>2 conductors are falling off. They're exposed. They</p> <p>3 should not be exposed. Those conductors there should be</p> <p>4 replaced.</p> <p>5 Q. Okay. And so y'all had --</p> <p>6 A. That's a hazard.</p> <p>7 Q. And so you're looking -- we talked about</p> <p>8 insulation a little bit earlier. For the jury, the --</p> <p>9 the -- you're talking about on the black wires, you can</p> <p>10 see some cracking?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. I can zoom in a little bit there. Is</p> <p>13 that -- is that what you're referring to?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And -- and this -- did you and Mr. Cude</p> <p>16 take this picture recently?</p> <p>17 A. Yes.</p> <p>18 Q. And this is Exhibit 13, and does that fairly</p> <p>19 and accurately represent what you observed?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. This is Exhibit 14 I've pulled up for</p> <p>22 you. Is this another one of the pictures y'all took?</p> <p>23 A. Yes.</p> <p>24 Q. And is this of the Arrowhead subdivision?</p> <p>25 A. Yes.</p>

Page 69

1 Q. And what are we looking at here?

2 **A. A burnt pole.**

3 Q. Okay. Any idea what might have caused that?

4 **A. Power line would be more my guess.**

5 Q. Okay. And, again, this is -- this is near --

6 how far do you think this is from Mr. Cude's former

7 residence on Vista Lane?

8 **A. It's within a mile radius.**

9 Q. Okay. Does this fairly and accurately

10 represent the power pole -- the conditions that you

11 observed?

12 **A. Yes.**

13 Q. I want to go back real quick to Exhibit 2,

14 which was the -- the power box. Can you see that on

15 your screen?

16 **A. Yes.**

17 Q. Okay. I didn't ask this before. Does this

18 fairly and accurately represent -- I think I did ask

19 what the condition of the -- the power box at the

20 time -- I guess back in 2011 when you completed the

21 installation; is that correct?

22 **A. Correct.**

23 Q. Okay. Did -- did you -- and we were talking

24 about the Arrowhead subdivision recently. And can you

25 describe -- is Arrowhead a fairly rural area? What --

Page 70

1 **A. It's a rural area.**

2 Q. Okay. And you mentioned earlier that -- that

3 y'all live in Sandia. Do you actually live in Sandia or

4 outside of Sandia?

5 **A. Well, that -- that's a weird setup there. We**

6 **live in Live Oak County, but we've got a Jim Wells zip**

7 **code. That don't make sense, but that's how it's set up**

8 **out here. We've got a Sandia in Jim Wells County and**

9 **then they call this out here Sandia also.**

10 Q. Okay. And is the Arrowhead subdivision

11 actually an unincorporated area or an unincorporated

12 subdivision?

13 **A. It's unincorporated.**

14 Q. It is?

15 **A. It's not -- it's unincorporated.**

16 Q. Unincorporated, right. And what does that

17 mean? Can you explain for the jury what that means?

18 **A. Well, there's no inspections to speak of. The**

19 **only inspections that actually comes out to this area is**

20 **the health department.**

21 Q. Okay. And so when you installed the -- the --

22 the power box, the service at Walt Cude's house back in

23 2011, did you need to get a permit from anybody to do

24 that?

25 **A. No. There was no inspection out here.**

Page 71

1 Q. In fact, who's responsible for inspecting the

2 electrical boxes and electrical --

3 **A. Well, I inspected this myself. Well, I**

4 **installed it myself. As far as having an official come**

5 **out here, there is no electrical inspector that comes**

6 **out to this area. Corpus Christi has got electrical**

7 **inspectors. George West has got electrical inspectors.**

8 **Jim Wells in town has got their electrical inspectors.**

9 **They do not have one out here.**

10 Q. Okay. So there's no requirement that you call

11 the city or the county to come out and inspect this when

12 you did the installation?

13 **A. Right.**

14 Q. There's no requirement of a permit?

15 **A. No.**

16 Q. Is the master electrician who does the

17 installation actually the person who's supposed to

18 inspect it? Is that correct?

19 **A. That's correct.**

20 Q. And who was that?

21 **A. Me, myself.**

22 Q. So as far as you're concerned, you complied

23 when you did the installation, when you did the

24 upgrades?

25 **A. It's up to NEC standards, National Electric**

Page 72

1 **Code.**

2 Q. How about the county, county rules and

3 regulations?

4 **A. It's correct; it's up to their standards and**

5 **AEP standards.**

6 Q. Okay. Thank you.

7 I want to go back real quick. We were

8 talking about the Arrowhead subdivision. It's kind of a

9 rural area?

10 **A. Right.**

11 Q. Okay. How would you compare it, you know,

12 to -- or -- or what is your opinion regarding the state

13 of the electrical system in the Arrowhead subdivision at

14 the time of the incident -- incident?

15 **A. Arrowhead's -- this area out here, it's rural**

16 **and they don't maintain their equipment. You go into**

17 **Corpus Christi and they maintain their equipment.**

18 Q. Okay. And so in comparing it to Corpus

19 Christi or other -- other subdivisions, what -- what --

20 what are your thoughts on that?

21 **A. We'd be a 1; Corpus Christi would be a 10.**

22 Q. And what -- what you're saying is it's just

23 not as well maintained?

24 **A. Correct.**

25 Q. Bill, I want to talk a little bit about the

<p style="text-align: right;">Page 73</p> <p>1 investigation you did after the fire, and in particular, 2 for this case. Can you -- can you tell the jury a 3 little bit about how you went about investigating? 4 A. I looked at the area around Walt Cude's house. 5 I found a bunch of melted triplex on his driveway. And 6 he had a bend over on his weatherhead. It used to have 7 a triplex which was attached to it, and it was burnt in 8 half and later on it come up missing. I don't know 9 where it went, have no idea about that. 10 Q. Okay. I'm going to pull up what's been marked 11 as Exhibit 15 here. Can you see that on your screen? 12 Are you able to see Exhibit 15 there, Bill? 13 A. I -- I see it, yes. 14 Q. Okay. All right. Is this Mr. Cude's 15 residence at 1110 Vista 10 Lane after the fire? 16 A. Correct. 17 Q. Did you take this picture? 18 A. I don't take pictures. 19 Q. All right. Do you know who took this picture? 20 A. Walt Cude. 21 Q. All right. Do you believe -- does this picture 22 fairly and accurately represent the -- you know, the 23 residence after -- after the fire? 24 A. Yes. 25 Q. Okay. And you can actually -- I believe you</p>	<p style="text-align: right;">Page 75</p> <p>1 look at here? 2 A. It was burnt in half, which it originated out 3 in the middle of Walt Cude's residence, and that's all 4 that was left of it at the time. But a few days later 5 on that -- that particular -- that triplex, what's left 6 of it came up missing. I don't know what happened to 7 it. 8 Q. Okay. And are you talking about the black 9 stuff here in -- 10 A. Right. 11 Q. Okay. And what -- you observed that -- you 12 said you observed and it was -- what -- what was the 13 term you used? 14 A. It was burnt in half. It was just hanging 15 there. And it was there and then it come up missing. 16 Q. Uh-huh. 17 A. I don't know what happened to it. I have no 18 idea. 19 Q. I think you had -- you had said it was fused; 20 is that correct? 21 A. The conductors was bonded together, melted 22 together. 23 Q. And you're talking -- the conductors, you're 24 talking about the triplex? 25 A. Yes.</p>
<p style="text-align: right;">Page 74</p> <p>1 can see some -- still see some smoke in there. Do you 2 know when this picture was taken? 3 A. I think it'd be at least two or three days 4 after that. The fire department had to keep going -- 5 coming out and burning -- or putting out embers. 6 Q. Okay. Were you with Walt when he took this 7 picture? 8 A. No. 9 Q. Okay. But would you agree that it fairly and 10 accurately represents the condition of the -- you know, 11 the residence and the scene -- 12 A. Yeah. 13 Q. -- after -- okay -- a few days after the fire? 14 I want to zoom in here real quick. You 15 were talking about the triplex and the weatherhead you 16 observed. If I zoom in here, is this what you're 17 talking about? 18 A. Yes. 19 Q. Can you see that? Okay. Can you explain to 20 the jury what we're looking at? It looks like there's a 21 T post and then maybe kind of a -- a spiral staircase. 22 And then to the right of that, what -- what are we -- 23 what are we -- 24 A. It's the triplex that was burnt. 25 Q. Okay. Anything in particular that we need to</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. Okay. And so the triplex wire is the -- the 2 wire that would have been -- the service drop from the 3 AEP pole to the residence? 4 A. Yes. 5 Q. Okay. And you observed -- tell us what you 6 observed. On the driveway, I think you said you 7 observed that that -- 8 A. I seen some melted aluminum. I seen some 9 triplex that was melted. I seen what was left of Walt 10 Cude's truck, because the triplex coming from AEP's 11 transformer was still energized and it melted Walt 12 Cude's truck down to the ground where there was nothing 13 left of it. 14 Q. And what's the significance of the triplex 15 having been melted together? What did -- what did that 16 indicate to you? 17 A. They told me that the fuse on the transformer 18 and the breaker, according to that nameplate on that 19 transformer, was not working correctly. 20 Q. Okay. 21 A. There was no way to shut it down. If it was 22 fused correctly, it would have cut the power on it and 23 Walt would still have his -- should have had his house 24 and his truck. 25 Q. And so what you're saying, the melted triplex</p>

<p style="text-align: right;">Page 77</p> <p>1 indicated to you that the transformer had not properly 2 fused or shut off at the time of the fire.</p> <p>3 A. Correct.</p> <p>4 Q. And you mentioned -- why don't we go back to 5 it right now. You mentioned a -- a plate?</p> <p>6 A. There was a nameplate on that particular 7 transformer. It's got details. Where it's got a fuse 8 at the line side of that transformer, that's the power 9 coming in, that's got a breaker on the secondary side.</p> <p>10 And I -- I just pulled up on your screen 11 what's labeled Exhibit 21. Do you see that, 12 Mr. Winkfein?</p> <p>13 A. I don't see that.</p> <p>14 Q. Can you -- can you take a look at your 15 computer screen?</p> <p>16 A. I just see lunch meeting or something.</p> <p>17 Q. Okay. Hold on a second.</p> <p>18 MR. SWALLOW: You guys want to take a 19 break real quick to make sure we get this -- let me -- 20 let me try sharing again.</p> <p>21 Madam Court Reporter, what are you 22 seeing?</p> <p>23 THE REPORTER: Nothing yet.</p> <p>24 THE WITNESS: There it is. There it is.</p> <p>25 MR. SWALLOW: Okay. That may have been</p>	<p style="text-align: right;">Page 79</p> <p>1 the -- looked at the transformer, right, you've observed 2 it?</p> <p>3 A. Yeah.</p> <p>4 Q. At least from the ground. I know you haven't 5 climbed up there.</p> <p>6 A. Yes.</p> <p>7 Q. But based on what you observed and what this 8 plate says, I mean, do you -- do you agree that this 9 is -- this is the transformer -- or that this -- this 10 plate accurately describes the transformer?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. And -- and what -- tell us a little bit 13 about the transformer. What -- what other information 14 were you able to obtain from this plate?</p> <p>15 A. There's two different plates. You got -- 16 well, there's -- there's one up there where it says 17 serial number. First two numbers tells you when that 18 particular transformer was manufactured. This is '64. 19 There you go. That's when that was manufactured.</p> <p>20 Q. So this -- this -- this transformer was 21 manufactured in 1964?</p> <p>22 A. According to that, that's exactly what 23 happened.</p> <p>24 Q. Okay. And anything else on this?</p> <p>25 A. It was made in Athens, Georgia.</p>
<p style="text-align: right;">Page 78</p> <p>1 Walt's. Is that -- do y'all have a picture of Exhibit 2 21, then?</p> <p>3 THE REPORTER: Yes.</p> <p>4 Q. (BY MR. SWALLOW) Okay. And Bill, are you 5 able to see Exhibit 21?</p> <p>6 A. I can see it, but it needs to come -- there 7 you go. Just -- see at the bottom right-hand corner of 8 that plate, it gives you a diagram how that transformer 9 is supposed to work. On the top of that it's showing a 10 fuse. At the bottom of that circle it's showing a 11 breaker. They did not work in this particular instance.</p> <p>12 Q. Okay. So this is the plate on Exhibit 1 that 13 you're talking about?</p> <p>14 Now, you weren't able to -- to actually 15 climb up on the pole and observe it.</p> <p>16 A. No. No, I'm too old for that.</p> <p>17 Q. All right. This is something that was 18 provided to you. Do you understand this -- where -- 19 where is this plate located, for the jury?</p> <p>20 A. It's on the transformer.</p> <p>21 Q. Okay. And -- and do you -- I mean, any reason 22 -- it's your understanding that this is the plate on the 23 AEP transformer?</p> <p>24 A. Yes. Walt took this picture.</p> <p>25 Q. Okay. And based on -- now, you've looked at</p>	<p style="text-align: right;">Page 80</p> <p>1 Q. Okay. Fair enough.</p> <p>2 Now, based on -- okay. Based on -- 3 looking at the information on here, did you believe that 4 the -- or do you believe -- is it your opinion that the 5 transformer was hooked up correctly?</p> <p>6 A. It was hooked up correctly, but that 7 particular transformer didn't work correctly.</p> <p>8 Q. Okay. What's that based on?</p> <p>9 A. The diagram on that nameplate.</p> <p>10 Q. Okay. And you're talking about the diagram 11 down here in the corner?</p> <p>12 A. Yes.</p> <p>13 Q. And I'm going to try to zoom in on that. And 14 -- okay, so this is Exhibit 21 and there's a diagram --</p> <p>15 A. It says HVB, so that means high voltage beams.</p> <p>16 Q. Okay.</p> <p>17 A. That's on your line side.</p> <p>18 Q. Okay.</p> <p>19 A. The bottom side, it says breaker. That's down 20 at the bottom. That's your secondary side.</p> <p>21 Q. Okay. And so where -- where -- explain that 22 to us a little bit. Explain that to the jury -- I -- so 23 they -- they can understand.</p> <p>24 A. You've got your main line, your power line, 25 coming in on your high voltage. It's got an insulator</p>

<p style="text-align: right;">Page 81</p> <p>1 on the outside of that transformer, and it's feeding</p> <p>2 into that transformer. It's got an internal fuse and</p> <p>3 it's got an internal breaker. Neither one of them</p> <p>4 worked.</p> <p>5 Q. And -- and what -- what are you basing that</p> <p>6 on?</p> <p>7 A. You got a constant power.</p> <p>8 Q. Okay.</p> <p>9 A. It did not shut off.</p> <p>10 Q. And because of the -- the fused triplex,</p> <p>11 that's why you believe there was constant power?</p> <p>12 A. Yes.</p> <p>13 Q. Okay.</p> <p>14 A. That's -- the transformer is not designed to</p> <p>15 lighten this electrical service at Walt Cude's house,</p> <p>16 it's not designed for that either [sic].</p> <p>17 Q. And if -- if I can summarize a little bit, if</p> <p>18 this transformer had been functioning correctly, you</p> <p>19 would not have seen melted triplex in the driveway; is</p> <p>20 that -- is that basically --</p> <p>21 A. That's correct, and you wouldn't have seen a</p> <p>22 burnt up house.</p> <p>23 Q. Okay. And I want to -- I pulled up what's</p> <p>24 labeled Exhibit 17. Have you seen this picture before?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 83</p> <p>1 A. Where your little arrow you got up there.</p> <p>2 Q. Okay. What am I -- that may be Walt -- that</p> <p>3 may be on Walt -- Mr. Cude's screen. I'm sorry. That</p> <p>4 may be on your screen. Are you talking about right down</p> <p>5 in here?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. The part I'm zooming in on here is the</p> <p>8 -- so that little kind of puddle of metal almost,</p> <p>9 that's -- that's melted triplex?</p> <p>10 A. Yes.</p> <p>11 Q. What you're saying, you wouldn't observe that</p> <p>12 before a fault in the transformer?</p> <p>13 A. I seen it when it was laying on his driveway.</p> <p>14 Q. And so this is similar to what -- you observed</p> <p>15 more of this in the driveway.</p> <p>16 A. Yes.</p> <p>17 Q. Can you describe to us a little bit what --</p> <p>18 what you -- what you observed in the driveway?</p> <p>19 A. Pretty much what you're looking at there.</p> <p>20 It's all melted insulation on those conductors and some</p> <p>21 conductors with no more insulation left on them; it's</p> <p>22 burnt.</p> <p>23 Q. Okay. Was there any other explanation that</p> <p>24 you could think of for having melted triplex?</p> <p>25 A. No, you just had a constant -- the voltage</p>
<p style="text-align: right;">Page 82</p> <p>1 Q. Is this something you reviewed as part of your</p> <p>2 investigation?</p> <p>3 A. Yes, that's melted fire (unintelligible).</p> <p>4 Q. Okay. And so this is Exhibit 17. What --</p> <p>5 what are we looking at here?</p> <p>6 A. This is triplex that is burned up from that</p> <p>7 surge, the power which would not shut off, and it just</p> <p>8 melted it. Nothing left of it.</p> <p>9 Q. And does this fairly -- fairly and accurately</p> <p>10 depict what you observed --</p> <p>11 A. Yes.</p> <p>12 Q. -- this fire you inspected?</p> <p>13 A. Yes.</p> <p>14 Q. Now -- now, these wires --</p> <p>15 A. Conductor, where your server is, that's where</p> <p>16 these all bonded together.</p> <p>17 Q. Uh-huh.</p> <p>18 A. And you've got 120 -- well, actually, you've</p> <p>19 got 240 volts now tied on with your grounded conductor.</p> <p>20 That's all going back into Walt Cude's home. It's not</p> <p>21 designed for that.</p> <p>22 Q. And you said -- you referenced -- you said</p> <p>23 there's a circle there. Are you talking about the --</p> <p>24 the little kind of puddle of metal or circle of metal</p> <p>25 down in --</p>	<p style="text-align: right;">Page 84</p> <p>1 coming out of that transformer which would not shut off,</p> <p>2 and that's what caused this.</p> <p>3 Q. Okay. And some of this melted triplex was</p> <p>4 away from the house, right?</p> <p>5 A. Yes.</p> <p>6 Q. Was away from the house fire and was going up</p> <p>7 the driveway, correct?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. And so can you think of anything else</p> <p>10 that could have caused that?</p> <p>11 A. No. Only thing that caused that is bad</p> <p>12 conductors. The triplex is a bad conductor. Like that</p> <p>13 one transformer you had up earlier where the insulation</p> <p>14 was coming off, electricity works the same principle as</p> <p>15 a water hose. You run your water hose for a period of</p> <p>16 time and certainly you're going to start getting leaks</p> <p>17 in it, have leaks in it. Electricity works exactly the</p> <p>18 same way. You've got the power source going through it,</p> <p>19 and eventually it's going to start having leaks in it</p> <p>20 and that electricity is going to come to the surface and</p> <p>21 that's what's called corona. You have white raised</p> <p>22 spots where the insulation is deteriorating.</p> <p>23 Q. And have you observed corona around the</p> <p>24 Arrowhead subdivision?</p> <p>25 A. I haven't observed any until this time.</p>

<p style="text-align: right;">Page 85</p> <p>1 Q. Okay. You observed some at Walt -- when you</p> <p>2 replaced the -- the service drop, though, the</p> <p>3 weatherhead at Walt Cude's residence, you observed some</p> <p>4 corona?</p> <p>5 A. Not at that time, no.</p> <p>6 Q. Okay. All right. I thought you had said on</p> <p>7 the power box on the internal wires that you replaced.</p> <p>8 A. Those -- that insulation on there, that's not</p> <p>9 triplex going down that.</p> <p>10 Q. Okay. But there was -- okay. All right.</p> <p>11 Fair enough. That was not the triplex, then. I got</p> <p>12 you.</p> <p>13 Does this fairly and accurately represent</p> <p>14 what you observed with Mr. Cude, the wires you observed?</p> <p>15 A. Yes.</p> <p>16 Q. And these -- where did you locate these?</p> <p>17 These were from Mr. Cude's house?</p> <p>18 A. They was at Mr. Cude's house.</p> <p>19 Q. Okay. And he -- he had picked these up after</p> <p>20 the incident?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. What else did you do as part of your</p> <p>23 investigation? Did you interview any people? Did you</p> <p>24 talk to any people around -- around the area?</p> <p>25 A. His neighbor, I think, is Mr. Day.</p>	<p style="text-align: right;">Page 87</p> <p>1 wasn't there at the time.</p> <p>2 Q. Okay. And that's what I wanted to clarify.</p> <p>3 You weren't there on the night of the fire.</p> <p>4 A. No.</p> <p>5 Q. Okay. Do you know who took this picture?</p> <p>6 A. I have no idea. It could have been Walt Cude.</p> <p>7 I don't know. I don't know who took that picture.</p> <p>8 Q. Okay. Do -- and do you know what a picture --</p> <p>9 do you know what it is? Is that -- what are we looking</p> <p>10 at?</p> <p>11 A. I think that's Walt Cude's house burned up.</p> <p>12 Q. Okay. Do you see any arcing or sparking in</p> <p>13 this picture?</p> <p>14 A. I just see a -- what's a fire is all I see in</p> <p>15 this particular picture.</p> <p>16 Q. Okay. Did you see any -- okay, fair enough.</p> <p>17 Who else -- who else did you talk to?</p> <p>18 You talked to Johnny Day. And any- -- anybody else?</p> <p>19 A. Ron Meyer. He's the one that works for the</p> <p>20 fire department. He was out there.</p> <p>21 Q. And what did -- what did Ron -- what did you</p> <p>22 discuss with Ron?</p> <p>23 A. Trying to figure out how that fire originated,</p> <p>24 which he -- they had AEP come out, and AEP went to</p> <p>25 Walt's other neighbor's house where that -- that triplex</p>
<p style="text-align: right;">Page 86</p> <p>1 Q. Okay.</p> <p>2 A. He observed it where it was arcing at Walt</p> <p>3 Cude's house and on his neighbor's house.</p> <p>4 Q. Okay. Explain that to us. He observed</p> <p>5 arcing? What -- what is arcing?</p> <p>6 A. That's like sparks sort of stay -- coming off</p> <p>7 the conductors, the triplex.</p> <p>8 Q. Okay. What -- what else? What's his</p> <p>9 neighbor's name?</p> <p>10 A. Mr. Day.</p> <p>11 Q. Do you know his first name?</p> <p>12 A. I'm not for sure. I think it's John.</p> <p>13 Q. John Day? And where does his neighbor live?</p> <p>14 A. Right across the road from Walt Cude.</p> <p>15 Q. On Vista Lane. And so he -- what did he</p> <p>16 tell you? He was there the evening of the fire?</p> <p>17 A. Yes.</p> <p>18 Q. And -- okay. He observed -- I've got a</p> <p>19 picture here, too. It's -- I'll pull it up. It's</p> <p>20 called -- it's labeled Exhibit 16. Have you seen this</p> <p>21 before?</p> <p>22 A. I have seen -- I've observed this before.</p> <p>23 Q. Okay. You -- you personally observed it or</p> <p>24 you had looked at the picture before?</p> <p>25 A. I just looked at the picture, that's all. I</p>	<p style="text-align: right;">Page 88</p> <p>1 was arcing also. And apparently they pulled the meter</p> <p>2 out of that so that wouldn't burn his house down either.</p> <p>3 And then in the meantime I think they got up with a</p> <p>4 bucket truck and they cut the lines loose feeding that</p> <p>5 other house.</p> <p>6 Q. Okay. And so Ron -- this was -- Ron had</p> <p>7 witnessed this on the evening of the fire?</p> <p>8 A. Yes.</p> <p>9 Q. Okay. Did you talk to -- did you talk to Walt</p> <p>10 as well?</p> <p>11 A. The next morning I talked to him.</p> <p>12 Q. Okay. And what did he observe the night of</p> <p>13 the fire?</p> <p>14 A. What he told me, he said when he came out of</p> <p>15 this burning house that those -- the triplex was arcing.</p> <p>16 Q. Okay. Can you explain to the jury when you</p> <p>17 say arcing, is that -- you know, what -- what -- what</p> <p>18 would that look like?</p> <p>19 A. Like a sparkler like kids use with all the</p> <p>20 sparks coming out.</p> <p>21 Q. Okay. And so if you have arcing like that,</p> <p>22 what -- what does that indicate to you? In your</p> <p>23 opinion, what was happening?</p> <p>24 A. You had the triplex going to Walt Cude's</p> <p>25 house, and I'm sure it went to ground, but there was no</p>

<p style="text-align: right;">Page 89</p> <p>1 place for it to shut off at the transformer. It kept 2 arcing in those conductors and they finally melted 3 together and they come down after the fact, which it had 4 already burned his house down and burned his truck down. 5 Q. Okay. Any -- anything else you did as part of 6 your investigation? 7 A. I walked around through it. Some of the 8 ashes -- there wasn't nothing left of anything, you 9 know. 10 Q. Okay. And what was your -- after -- after 11 doing -- after doing your investigation, what was your 12 opinion, what was your conclusion you came up with? 13 A. My conclusion was that transformer did not 14 trip the power going through that pipe like 15 (unintelligible) in Mr. Walt's house. And that's where 16 it started and that's where it ended. 17 Q. Is there anything that, in your opinion, your 18 expert opinion, that -- that Mr. Cude could have done, 19 you know, or that would have caused the fire, that would 20 have caused what -- you know, the arcing wires, melted 21 triplex, the things -- 22 A. No. No. 23 Q. Is this the sort of accident that would happen 24 without some form of negligence? 25 A. It's an accident because of no maintenance.</p>	<p style="text-align: right;">Page 91</p> <p>1 through the nipple from that meter box and it's going 2 right back into Walt Cude's house. That's all the 3 ground wires, all the grounding conductors and the other 4 conductors were all caught on fire. There was no way to 5 shut it down. The insulation caught on fire and just 6 went on and on. 7 Q. Okay. And -- and if -- if -- I think if I'm 8 understanding you correctly, then -- then the power that 9 was surging into -- to Mr. Cude's residence would have 10 -- would have heated up the wires inside the walls 11 and -- 12 A. Yes, and the insulation that's over the wires. 13 That -- that will start a fire just like getting a piece 14 of newspaper and put it on some hot charcoal in a 15 barbecue grill; it catches on fire. Insulation on a 16 conductor is doing the same thing. 17 Q. And so if you've got -- if you've got the 18 extreme voltage, you know, coursing into the house and 19 those wires get hot enough, they're going to get hot and 20 they're going to catch the insulation, the plastic 21 insulation on the wire on fire as well as -- 22 A. That's correct. 23 Q. -- the house is. Okay. 24 You know, and you -- you -- we -- we 25 showed the -- the picture of the power box earlier and</p>
<p style="text-align: right;">Page 90</p> <p>1 Q. I mean, the -- the -- the things that you 2 observed, though, in -- in the absence of some 3 negligence on behalf of one of the parties, is that -- 4 is that something that, you know -- would the accident, 5 you know, have occurred without some negligence? 6 A. The accident wouldn't have occurred if AEP 7 maintained their triplex and their transformers. 8 Q. And I wanted to explain a little bit more for 9 the jury. What -- what do you believe to be the -- the 10 source of the fire? You know, how did the fire, you 11 know, get from the arcing triplex to Mr. Cude's 12 residence? How did -- how did it -- how did the fault 13 in the transformer and the ground wires, how did that 14 translate into Mr. -- Mr. Cude's residence burning down? 15 A. All the conductors in that triplex going to 16 Mr. Cude's house, they all bonded together. That's 17 where you got two 120-volt lines which turns into 18 240-volt lines, goes into the grounded conductor. That 19 goes back into the meter. On your meters you pulled 20 out, it's got two stab-ins, one for 120 on one side, 120 21 on the other side. Your neutral or your grounded 22 conductor has got a solid bar that goes straight 23 through. There's no place where you can disconnect 24 that. That feeds through. On that grounded conductor, 25 you've got 240 volts going through that and it's going</p>	<p style="text-align: right;">Page 92</p> <p>1 you had done the installation on that. I noticed there 2 was a surge protector on there and there was a main 3 breaker, and I noticed that all the individual circuits 4 in the house also had breakers on them. 5 Now, can you explain to me why -- why 6 didn't those breakers trip, why didn't -- why didn't 7 that stop -- stop the fire from -- from going into 8 Mr. Cude's residence? 9 A. You had a constant voltage going into that 10 panel box which could not be shut off at that 11 transformer. That should not happen; it's not designed 12 for that. You had a constant voltage until the trans- 13 or the triplex burned in half, but at the same time when 14 that was going on we had that 240 volts of -- going 15 through Walt Cude's house and it was melting the wires. 16 By that time that triplex burned in half, but meantime 17 it already caught Walt Cude's house on fire from the 18 insulation. 19 Q. Now, if -- what happened to the -- to the 20 breakers? And did you look around for the breakers and 21 the contents of the box out there? 22 A. There was nothing left. It was all melted. 23 Q. And what would have happened to the breakers 24 when -- when the -- 25 A. They all caught on fire.</p>

<p style="text-align: right;">Page 93</p> <p>1 Q. Okay. Would -- would the -- would the current</p> <p>2 have been such that it could jump the breakers or how --</p> <p>3 can you explain to the jury how that happened? I'm</p> <p>4 trying to understand how this conductor and the breakers</p> <p>5 didn't stop this fire.</p> <p>6 A. It could not -- could not have stopped that</p> <p>7 fire. You have a constant voltage that's going -- it's</p> <p>8 feeding your grounding conductors and your grounded</p> <p>9 conductors. It was going through there and it was going</p> <p>10 up through the conductors going into Walt Cude's house.</p> <p>11 In the meantime it's burning all the wires and</p> <p>12 conductors in that panel and the breakers. There was --</p> <p>13 there would have been no way to shut that off until that</p> <p>14 triplex burned in half, or if that transformer would</p> <p>15 have worked, which was designed for it, it would have</p> <p>16 tripped; this would not have happened.</p> <p>17 Q. How about -- okay. If there had been a fuse</p> <p>18 cutout, would that have protected the residence as well?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. And a fuse cutout -- and we looked at</p> <p>21 those a lot earlier, we looked at the ones on the power</p> <p>22 poles and -- and -- and some of the power poles around</p> <p>23 the neighborhood. Do those also -- they're not just --</p> <p>24 they have an actual fuse on them, correct? Is that --</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 95</p> <p>1 A. Not what I've seen.</p> <p>2 Q. Okay. You couldn't -- you don't believe --</p> <p>3 okay. Fair enough.</p> <p>4 I want to -- are you all right to keep</p> <p>5 going a little bit longer, Mr. Winkfein?</p> <p>6 A. A little bit.</p> <p>7 Q. All right. I appreciate it.</p> <p>8 What -- what -- what sources, materials</p> <p>9 did you rely upon? Did you bring those with you today?</p> <p>10 A. Just these wires I showed you earlier.</p> <p>11 Q. Yeah, the wires, we looked at those. How</p> <p>12 about -- I think you had a lineman's book and maybe a --</p> <p>13 A. Oh, yes.</p> <p>14 Q. Do you have that stuff there with you?</p> <p>15 Okay. Can you hold that up? Can you</p> <p>16 hold that up for the camera and show the jury?</p> <p>17 A. (Indicating).</p> <p>18 Q. You got -- a little bit high. That's pretty</p> <p>19 good, okay.</p> <p>20 And that says the Lineman's & Cableman's</p> <p>21 Handbook 8th Edition. And is -- is that a source that</p> <p>22 you relied upon in your investigation?</p> <p>23 A. That was part of it, but I took a test on this</p> <p>24 years ago. This was nationwide. There's several</p> <p>25 different electrical engineers and power companies got</p>
<p style="text-align: right;">Page 94</p> <p>1 Q. And they're designed to cut out in -- in -- in</p> <p>2 this sort of circumstance?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. So is it in -- in your opinion, in your</p> <p>5 professional opinion, if -- if there had been a cutout</p> <p>6 fuse on the -- the supply side, would that have likely</p> <p>7 had protected the house?</p> <p>8 A. That would -- that would have eliminated the</p> <p>9 problem.</p> <p>10 Q. Okay. I want to ask a little bit too. Any --</p> <p>11 anything else that would have fixed the problem? We</p> <p>12 talked about the cutout. How about if there had been</p> <p>13 a -- a ground on -- the proper ground on the pole?</p> <p>14 Would that have helped?</p> <p>15 A. No.</p> <p>16 Q. No. That wouldn't? Okay. All right.</p> <p>17 Any other -- any other -- any other</p> <p>18 faults you found in the AEP system that -- that you</p> <p>19 believe contributed to the fire?</p> <p>20 A. There was not fuse or breaker in that</p> <p>21 transformer. If there was, it was not working</p> <p>22 correctly.</p> <p>23 Q. Okay. Did you -- did you consider</p> <p>24 alternatives, other alternatives to what might have</p> <p>25 caused the fire?</p>	<p style="text-align: right;">Page 96</p> <p>1 all their readings in it.</p> <p>2 Q. Okay. Did you -- any -- any other sources you</p> <p>3 relied upon for your investigation?</p> <p>4 A. National Electric Code.</p> <p>5 Q. Okay. Do you have that with you too? There</p> <p>6 you go. And that's the 2011 Edition.</p> <p>7 A. Yeah.</p> <p>8 Q. Okay.</p> <p>9 A. Only difference between this and a new one,</p> <p>10 they just add different things to it. They don't take</p> <p>11 anything away from it.</p> <p>12 Q. Gotcha. So generally the -- the same -- those</p> <p>13 should be the same provisions?</p> <p>14 A. Yeah.</p> <p>15 Q. Okay. And I'm going to pull up what's, let's</p> <p>16 see, Exhibit 26 on -- do you have that? Do you see that</p> <p>17 on your screen?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Is that a -- is that a fair and</p> <p>20 accurate representation of your -- your book that you</p> <p>21 just showed us, I guess?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And same thing, Exhibit 26 is a Lineman</p> <p>24 & Cableman's Code; that's the same one you relied upon?</p> <p>25 A. Yes.</p>

<p style="text-align: right;">Page 97</p> <p>1 Q. What did you -- from consulting those sources, 2 did you -- what did they tell us about this incident or 3 what -- what AEP maybe should have done in this case? 4 A. They should have a transformer that was 5 functional. They should be maintained periodically. 6 They should have a ground rod and a -- and a proper 7 ground wire going to the ground rod, which the ground 8 rod is supposed to be 10 foot by five-eighths-inch 9 ground rod. And their particular ground wire, they -- 10 they used was all corroded up. It looked like it's got 11 a kink in it. That should have been taken care of, 12 have a proper ground wire going to that ground wire. 13 Q. And had AEP done those things, had they 14 properly maintained the -- the equipment, had to have a 15 cutout fuse, had to have proper ground rod -- 16 A. They should have went out to the house and 17 observed it just like I did, and apparently they did 18 not. 19 Q. Had they done that, then you don't -- in 20 your -- in your opinion, this -- this -- the fire would 21 not have occurred. 22 A. That's right. 23 Q. Okay. And I want to look at Exhibit 26 a 24 little bit more here. There's -- did you -- did you 25 find any specific codes that were violated? I think you</p>	<p style="text-align: right;">Page 99</p> <p>1 Q. So in your -- in your opinion, then, the -- 2 the AEP was in violation of this standard? 3 A. Yes. 4 Q. Any -- any other standards you -- you believe 5 AEP violated? 6 A. Secondary over current protection. 7 Q. Is that in the -- that's in the same -- same 8 table here. Okay. And how did they violate that 9 provision? 10 A. There was no secondary protection on it. 11 Q. Okay. And what is secondary protection? 12 A. That's where your -- secondary is your triplex 13 coming out of that transformer feeding into Walt's 14 house. 15 Q. Okay. And what kind of protection should they 16 have had on it? 17 A. They should have a fuse or a breaker which 18 should have been at least accessible outside that 19 transformer. 20 Q. And they didn't have that. And are you 21 talking about a cutout fuse? 22 A. No, I'm talking about a circuit break or fuse, 23 something that you can get to to shut it off. 24 Q. I understand. Was -- was there -- in -- in 25 this transformer, was it internally fused? Is that it?</p>
<p style="text-align: right;">Page 98</p> <p>1 may have referenced these in your report, but do you 2 remember them offhand? 3 A. The NEC code, it's supposed to have a -- there 4 you go right there. 5 Q. Which one? This one right here? 6 A. Yes. 7 Q. Okay. And this is -- this is from the NEC. 8 It's -- are we looking at table 450-3A; is that correct? 9 A. Correct. 10 Q. Okay. What does the NEC code tell us? 11 A. It tells you how to protect on your primary 12 volts, primary protection over 600 volts. It shows the 13 circuit breaker and shows a fuse. And that's your line 14 side. It's 300 percent that you go on your fuse sides 15 of this. 16 Q. Okay. So what -- what do we -- what is this 17 table showing us? 18 A. That's what the primary site should have had 19 for protection on that transformer. 20 Q. Okay. 21 A. It says at the top, primary protection. This 22 is over 600 volts. 23 Q. Okay. So you're -- 24 A. That was a 7200 volt line. So that exceeds 25 600 volts.</p>	<p style="text-align: right;">Page 100</p> <p>1 A. Yes. According to the diagram on that 2 nameplate, you have it internally fused and you have it 3 -- internally breaker on this particular transformer, 4 according to that nameplate, and neither one of them 5 worked. 6 Q. Now, would that have satisfied the provisions 7 of code? 8 A. No. Well, it would have, yes, if they worked, 9 but they didn't. 10 Q. Okay. 11 A. This -- this is from bad maintaining, bad 12 maintenance. 13 Q. Okay. Had they -- had they functioned 14 properly, then -- then that would have been -- but -- 15 but the problem was, in your -- in your opinion, is that 16 due to poor maintenance or the age of the transformer, 17 the 1964 transformer, that that -- that that fuse was so 18 rusted up or not working that it failed to trip? 19 A. That's correct. 20 Q. Okay. And -- and what do you base that on? 21 What facts support that conclusion? 22 A. Just from what I've observed around this area 23 on their transformers, and around this area they're 24 all rust buckets and need to be replaced and new ones 25 installed.</p>

<p style="text-align: right;">Page 101</p> <p>1 Q. Okay. And beyond that, though, I'm talking 2 about the specific transformer at Walt Cude's house -- 3 (Simultaneous speaking.) 4 A. I didn't strip it because -- 5 Q. -- transformer didn't trip? 6 A. It didn't trip. 7 Q. But how do we know that? What facts support 8 that? 9 A. Walt's burnt house and his melted truck. 10 After the triplex melted in half, it was still 11 energized. 12 Q. Okay. So what you're saying, after -- what 13 Walt observed, what the neighbors observed and -- and -- 14 did you observe Walt's melted truck? You referenced to 15 a melted truck. 16 A. Yes. 17 Q. Can you tell us a little bit more about that? 18 I don't think we -- we -- we told -- we discussed -- 19 A. Triplex when it melted, it fell down on Walt's 20 truck. It melted that truck because it was still 21 energized, and it got to your gas tank, which that 22 caught on fire. Gas and fire don't go together too 23 well. And it just melted down even with the rims on 24 that metal off. Toolbox and everything in that truck 25 melted, even the engine.</p>	<p style="text-align: right;">Page 103</p> <p>1 MR. SWALLOW: Yes, sir. 2 THE VIDEOGRAPHER: This is the 3 videographer. I was wondering if we can take a quick 4 break. I wanted to see if I can adjust something on my 5 laptop really quickly. 6 MR. SCHAUER: Yeah. It's probably 7 lunchtime anyway. 8 THE VIDEOGRAPHER: Okay. 9 MR. SCHAUER: Why don't we just call it 10 quits for lunchtime. 11 THE VIDEOGRAPHER: Okay. The time is 12 12:17 p.m. We are off the record. 13 (Break from 12:17 to 1:17 p.m.) 14 THE VIDEOGRAPHER: The time is 1:17 p.m. 15 We are now on the record. 16 Q. (By Mr. Swallow) Mr. Winkfein, we are back on 17 the record. You all right to continue? I saw you -- 18 you coughing there a little ways there. Are you feeling 19 okay? 20 A. I'm fine so far. 21 Q. Okay. You let us know. If you need a break, 22 let us know. This is -- this is your show so just tell 23 us if you need a break and -- 24 A. All right. I've been on shows before, real 25 shows. I played -- I played on the Grand Old Opry years</p>
<p style="text-align: right;">Page 102</p> <p>1 Q. And you personally observed a melted truck. 2 A. Yes. 3 Q. And so what you're saying is after the wires 4 burnt through because of the heat from either the -- you 5 know, the -- the current or the heat from the fire, they 6 continued to be live wires and then fell on to 7 Mr. Cude's truck -- 8 A. Yes. 9 Q. -- and it melted down Mr. Cude's truck? 10 A. Yes. Well, it's got gasoline in it too. 11 Gasoline and fire don't go -- mix together. Apparently 12 the whole truck caught on fire from that line. 13 Q. Okay. It seems that there should be some 14 safety precaution. I think that's -- if I understand 15 you right, what you're saying is, is that transformer, 16 had it been operating and properly maintained that there 17 should have been a fuse trip when, you know -- 18 A. Sure. 19 Q. -- at some point. It should not have 20 continued -- 21 A. No. 22 Q. -- to melt down the truck. Okay. 23 A. No. 24 THE VIDEOGRAPHER: Mr. Swallow, excuse 25 me.</p>	<p style="text-align: right;">Page 104</p> <p>1 ago. 2 Q. No kidding? We're on the record so I'm not 3 sure that the jury wants to hear about the Grand Old 4 Opry, but I would like to hear about that some day so -- 5 A. Okay. 6 Q. -- on a break, if you tell me about that. 7 But at this point let's -- let's get 8 back -- if you don't mind, let's get back to the 9 questions but -- 10 A. Sure. 11 Q. Yeah. Yeah. All right. 12 Did you -- did you review any of the 13 expert reports that were produced by AEP's experts in 14 this case? 15 A. I haven't talked to AEP personally, no. 16 Q. Okay. Did you know -- did you -- they -- they 17 designated a couple experts in this case. Did you have 18 a chance to review their reports at all? 19 A. No. 20 Q. Okay. And let's -- and I just have a couple 21 questions. One -- one of their -- one of their experts, 22 I believe his name is Ricardo Torres, said that -- that 23 no scientific conclusion can be made as the origin and 24 cause of the fire. Do you -- do you have an opinion as 25 to that?</p>

<p style="text-align: right;">Page 105</p> <p>1 A. Yes, I do.</p> <p>2 Q. Okay. And what are your thoughts on that?</p> <p>3 A. Well, that particular transformer had a</p> <p>4 constant voltage coming out of it. There was no way to</p> <p>5 trip it, which means turn the breaker or fuse off. And</p> <p>6 the voltage kept coming out, and that burnt my house</p> <p>7 down plus Walt's truck down. There wasn't no way to</p> <p>8 shut it off. And that does not go back to that</p> <p>9 substation. Those particular instruments or</p> <p>10 transformers, they're not designed for that. They're</p> <p>11 supposed to have a -- supposed to be fused. That's</p> <p>12 where it cuts off. But you'll get the -- it goes back</p> <p>13 through that grounded conductor. Every house down</p> <p>14 through the street is going to collect the same thing.</p> <p>15 Q. And you're talking about the -- the -- the</p> <p>16 middle wire, the neutral wire --</p> <p>17 A. Right.</p> <p>18 Q. -- on the conductor. And so in your opinion,</p> <p>19 if I can summarize just a little bit, what should have</p> <p>20 happened is the breaker or the -- the fuse on the -- the</p> <p>21 transformer should have tripped and sent it into the</p> <p>22 ground wire down at the bottom of the pole. Is that --</p> <p>23 is that --</p> <p>24 A. That's correct.</p> <p>25 Q. Okay. Based on what you witnessed on the</p>	<p style="text-align: right;">Page 107</p> <p>1 originated in the triplex wires to the house, the energy</p> <p>2 would have been cut off when the wires separated and no</p> <p>3 further arc damage would have been found in the copper</p> <p>4 conductors inside the structure. I -- I don't know that</p> <p>5 you had a chance to observe the copper conductors inside</p> <p>6 the structure.</p> <p>7 A. There was nothing left of it.</p> <p>8 Q. Okay. If -- do you agree with his assessment</p> <p>9 that if -- if the -- if the electricity or if the -- the</p> <p>10 fault -- that the fire had originated in the triplex</p> <p>11 wires, do you agree that -- that it -- you know, that</p> <p>12 would not have caused any damage to the house?</p> <p>13 A. That would be correct.</p> <p>14 Q. Okay. So you think -- and let me -- let me --</p> <p>15 let me be -- I want you to be careful on this one. But</p> <p>16 if -- why don't you just -- can you -- can you explain</p> <p>17 that a bit more to the jury? How is that?</p> <p>18 A. Installation on the triplex bonded together</p> <p>19 after the installation went off. Wouldn't have been a</p> <p>20 fuse on that transformer or a breaker. That power</p> <p>21 shouldn't have been shut down, and nothing would have</p> <p>22 come about, would happen.</p> <p>23 Q. Okay. But in your -- in your opinion, though,</p> <p>24 the fire did originate in the triplex or -- I'm not sure</p> <p>25 if I'm saying that right.</p>
<p style="text-align: right;">Page 106</p> <p>1 interviews that you conducted, on the evidence you</p> <p>2 looked at, and -- and your knowledge and your background</p> <p>3 in electrical engineering and electrical installations,</p> <p>4 would an internal fault or short in the -- in the</p> <p>5 residences in Mr. Cude's electrical system have caused</p> <p>6 the arcing, another thing that was witnessed by -- was</p> <p>7 witnessed by Mr. Cude and -- and -- and the -- the</p> <p>8 firefighters and other people out there?</p> <p>9 A. No.</p> <p>10 Q. Okay. And what's the basis of that? Do you</p> <p>11 have a -- if there had been a -- if there had been an</p> <p>12 electrical issue inside Mr. -- Mr. Cude's, you know,</p> <p>13 residence --</p> <p>14 A. It would have tripped the breakers.</p> <p>15 Q. Go ahead.</p> <p>16 A. It would have tripped the breakers.</p> <p>17 Q. Okay.</p> <p>18 A. Main breaker. That wouldn't fit back through</p> <p>19 that meter feeding back to the triplex.</p> <p>20 Q. So what you're saying is it wouldn't have seen</p> <p>21 the melted triplex, the wires on fire, the arcing, the</p> <p>22 sparks, that sort of stuff?</p> <p>23 A. No.</p> <p>24 Q. I want to read you one more statement from</p> <p>25 Mr. Torry's (ph.) report. It says that if the fire had</p>	<p style="text-align: right;">Page 108</p> <p>1 A. Yeah, it originated on the triplex.</p> <p>2 Q. And then it moved into the house, the wires in</p> <p>3 the house heated up and caused the additional fire.</p> <p>4 A. Right.</p> <p>5 Q. Okay. So I think what Mr. Torres is saying,</p> <p>6 and I haven't had the chance to take his deposition yet,</p> <p>7 but I believe what he's saying is if the fire had</p> <p>8 originated in the triplex wires as -- as I believe</p> <p>9 you're saying, that -- that those wires merely would</p> <p>10 have separated and -- and that would have been the end</p> <p>11 of it.</p> <p>12 A. No.</p> <p>13 Q. Okay. And why -- why do you disagree with</p> <p>14 that?</p> <p>15 A. The insulation on the conductors on the</p> <p>16 triplex melted together and they bonded together. And</p> <p>17 if that transformer would have been fused or had a</p> <p>18 breaker on correctly, that would not have happened. It</p> <p>19 was still energized when it come down on Walt Cude's</p> <p>20 truck.</p> <p>21 Q. Bear with me for one second here. I wanted</p> <p>22 to -- I want to pull up one -- one other exhibit here.</p> <p>23 It's Exhibit 24. I just wanted to see if you recognize</p> <p>24 this, if you remember writing it. Can you -- can you</p> <p>25 see this on your screen, Mr. Winkfein?</p>

<p style="text-align: right;">Page 109</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And do -- what -- what did -- can you</p> <p>3 tell the jury what this is, Exhibit 24?</p> <p>4 A. This is telling what I installed on Walt</p> <p>5 Cude's house.</p> <p>6 Q. Uh-huh.</p> <p>7 A. It's a nude 200-amp cover hammer main power</p> <p>8 breaker. The main means it's got a main breaker on it</p> <p>9 and...</p> <p>10 Q. Okay. Was it -- was it -- is this a statement</p> <p>11 that you -- you -- you made?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And what -- do you remember when you</p> <p>14 made this?</p> <p>15 A. Not approximately, no, I don't. It was after</p> <p>16 the house fire.</p> <p>17 Q. Do you agree -- do you still agree with your</p> <p>18 conclusions?</p> <p>19 A. Yes, I do.</p> <p>20 Q. I pulled up what's labeled as Exhibit 27 and</p> <p>21 it's called AEP's or American Electric Power Guide For</p> <p>22 Electric Service and Meter Installations. Is this</p> <p>23 something you also reviewed as part of your</p> <p>24 investigation research into this?</p> <p>25 A. That particular program there is for the</p>	<p style="text-align: right;">Page 111</p> <p>1 their own installation guidelines?</p> <p>2 A. Yes, they did.</p> <p>3 Q. In what way?</p> <p>4 A. Well, besides grounding conductor, about</p> <p>5 maintaining that particular transformer, which should</p> <p>6 have shut it down. It all basically goes down to</p> <p>7 maintenance.</p> <p>8 Q. Okay. So the -- the transformer was an issue.</p> <p>9 Any -- anything else with the ground that was an issue</p> <p>10 or that was inconsistent with the installation</p> <p>11 guidelines?</p> <p>12 A. Just the ground wire. It was a little small.</p> <p>13 It should have been a number 4, which AEP required of</p> <p>14 each service. Any residents should be a number 4</p> <p>15 ground, and they should have had a number 4 of theirs,</p> <p>16 and the ground rod was supposed to be about three foot</p> <p>17 away from that pole.</p> <p>18 Q. Are you familiar, having lived in the</p> <p>19 Arrowhead subdivision for -- for a number of years, are</p> <p>20 you familiar with any other AEP customers and residents</p> <p>21 in that area that have had problems with their</p> <p>22 electrical installations for AEP?</p> <p>23 A. Yes, I do. They've had electric poles just</p> <p>24 fall down because there's rock.</p> <p>25 Q. Can you -- can you provide us some --</p>
<p style="text-align: right;">Page 110</p> <p>1 people that work for AEP.</p> <p>2 Q. Okay. And did you -- did you find any faults</p> <p>3 with the system or -- or I guess violations of AEP</p> <p>4 manual with the -- with Mr. Cude's system?</p> <p>5 A. Well, Mr. Cude's system was fine. He was up</p> <p>6 to their standards.</p> <p>7 Q. Okay. Fair enough. I got it. How about with</p> <p>8 AEP's electrical installations?</p> <p>9 A. Their installation was incorrect. It's just</p> <p>10 poor maintenance.</p> <p>11 Q. Okay. Poor maintenance. And I'm going to</p> <p>12 flip through here. Did you -- did you have a chance to</p> <p>13 review these?</p> <p>14 A. No, I did not.</p> <p>15 Q. You did not. Okay. So you're not familiar</p> <p>16 with this -- with this guide then.</p> <p>17 A. No.</p> <p>18 Q. Okay. All right. Fair enough.</p> <p>19 A. I'm familiar with what they -- they need or</p> <p>20 require at each service.</p> <p>21 Q. Okay. Are you familiar with the requirements,</p> <p>22 then, that would be in the AEP installation guide?</p> <p>23 A. Yeah.</p> <p>24 Q. Okay. And -- and did you -- were there any --</p> <p>25 did -- did they fail to follow -- did AEP fail to follow</p>	<p style="text-align: right;">Page 112</p> <p>1 some instances of that?</p> <p>2 A. This friend of mine, her name is Renee Berry,</p> <p>3 they lost all their service. Because of the electric</p> <p>4 poles, power poles, they just fell down and they're just</p> <p>5 rotten. They're not maintaining their equipment.</p> <p>6 Q. Okay. How about any -- any instances of, you</p> <p>7 know, lights flickering, that sort of stuff that you --</p> <p>8 A. I've had that at my house two or three times</p> <p>9 I've had to call them out, and they had loose</p> <p>10 connections on their transformers.</p> <p>11 Q. Okay. And -- and when was -- when did that</p> <p>12 occur?</p> <p>13 A. That happened last summer.</p> <p>14 Q. And had you come out and serviced the</p> <p>15 transformer?</p> <p>16 A. Yes, they resolved it.</p> <p>17 Q. Any other -- any other instances of, you know,</p> <p>18 lights flickering, that sort of stuff?</p> <p>19 A. I've had a couple of other friends of mine</p> <p>20 that's had the same thing, and I already -- I checked</p> <p>21 their panel boxes and everything was tight. I called</p> <p>22 the power company and they came out and found, like,</p> <p>23 loose wires on the transformers.</p> <p>24 Q. And do you know their names? Can you provide</p> <p>25 a little bit more detail on that?</p>

<p style="text-align: right;">Page 113</p> <p>1 A. One of them's name was Sarry Walker. And 2 another one was Pat McGill, which he passed away, and 3 then just myself. 4 Q. And do you remember when -- do you remember 5 those instances when they occurred? 6 A. It's been a couple of years ago. 7 Q. Now, another -- another thing that I wanted to 8 ask you about. Mr. Cude on -- had another -- there was 9 another -- he had a neighbor who was also connected to 10 the same transformer, I believe. And are you -- are you 11 familiar with that? 12 A. Yeah, Walt had told me something about that. 13 Q. Do you know the neighbor's name or do you know 14 the neighbor? 15 A. I think his name is Donnie King. 16 Q. Okay. Is his house still -- still located on 17 Vista Drive there? 18 A. Yes. 19 Q. And if -- now, my question is, and -- and I 20 think this may have come -- come up in your 21 investigation. But can you -- can you explain to the 22 jury why -- you know, why the neighbor's house was 23 affected -- or maybe it wasn't affected -- where 24 Mr. Cude's, you know, ended up burning down? Can you 25 explain if -- if the fault was in the transformer in the</p>	<p style="text-align: right;">Page 115</p> <p>1 A. Yes, I did. 2 Q. Any other reasons you can think of why -- why 3 the neighbor's house would not have been affected by the 4 fire? 5 A. They -- they got out there in time and saved 6 it. 7 Q. Okay. 8 A. They replaced that triplex going to that 9 neighbor's house too. 10 Q. After the fire. 11 A. Right. 12 Q. Okay. Do you -- do you remember when that 13 occurred? 14 A. I think it was within a day or the same day as 15 Walt Cude's house was burning. 16 Q. Uh-huh. And I -- I -- I want to ask you real 17 quick. I -- I pulled up on the screen here what's 18 called -- what's been labeled Exhibit 22. Did you 19 review this photograph as part of your investigation? 20 A. I have seen it up there but I haven't really 21 reviewed it. 22 Q. Okay. Can you tell us what -- what Exhibit 22 23 is? What -- what is that a picture of? 24 A. It's a -- a -- a pole and a transformer. 25 Q. And when you -- yeah.</p>
<p style="text-align: right;">Page 114</p> <p>1 ground, as you explained, why didn't -- you know, why 2 didn't Walt's neighbor, who was also connected to the 3 transformer, burn down on the -- the night of November 4 19th, 2017, or the morning I guess it was? 5 A. Well, power company came out and apparently 6 they went over and pulled the meter out of the 7 neighbor's house and cut the wires loose at the 8 transformer. And that's why he didn't have any damage 9 at his particular house. Part of that power pole, just 10 on the inside of his property, it was just a brace to 11 hold the wire up. About every hundred feet you need to 12 set up a power pole to hold up the conductors that have 13 that power poles burnt. 14 Q. So it appeared that there was some fire 15 damage -- 16 A. Yes. 17 Q. -- to the power pole. 18 Do you know what that -- was that power 19 pole grounded at all? 20 A. That particular one didn't have to have a 21 ground on. There was no transformer or any equipment 22 installed on that. That was just a brace to hold the 23 wires up. 24 Q. Okay. But you did -- did observe some -- some 25 scorching or some burning on that power pole.</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Secondary lines coming off of it. 2 Q. And where is that pole located? Is that the 3 transformer outside of Walton Cude's former residence? 4 A. Yes. 5 Q. Okay. So this is the -- the defective 6 transformer that we've been talking about? 7 A. Right. 8 Q. Okay. Do you know when this picture was 9 taken? 10 A. No, I don't. 11 Q. Okay. Do you believe it fairly and accurately 12 represents the power pole that -- the -- the -- I know 13 you didn't take the picture, but is -- is -- do you 14 think that's a fair and accurate representation? 15 A. Yes. 16 Q. All right. And I pulled up here what's -- 17 what's called Exhibit 23. Can you -- can you tell us 18 what this is? 19 A. That's so they -- piece of equipment 20 installed, a new power pole at Walt Cude's house. 21 Q. Okay. And do you know why -- why were they 22 installing a new power pole? 23 A. The other one was rotten, about to fall down. 24 Q. Okay. Do you know when they installed this 25 power pole?</p>

<p style="text-align: right;">Page 117</p> <p>1 A. It was right after that hurricane Harvey come 2 through. 3 Q. Okay. Sometime -- so this would have been 4 before the fire, correct? 5 A. It would have been before, yes. 6 Q. All right. If I tell you it was probably -- I 7 mean, if hurricane Harvey happened in August 2017, does 8 that sound about right? 9 A. Yeah. 10 Q. Okay. Now, I think in your report you had 11 discussed, if I'm not mistaken, that you thought that 12 the installation of this power pole may have also 13 contributed to -- to the -- to the fire. 14 A. What they did, they just -- they did not 15 replace the triplex going to Mr. Cude's house. They 16 just transport those conductors onto the new pole. They 17 pulled them a little bit too tight. They should have a 18 little bit of loop in them, about two foot dip in it, so 19 to speak, where it was sagging just the two feet. But 20 they pulled them too tight and these have play because 21 of the wind and the environments in this area. 22 Q. Okay. And -- and if you can for the jury, can 23 you -- can you explain to them a little bit in -- in 24 Exhibit 23, which one is the -- we -- we saw a service 25 drop before that was installed by AEP that was too</p>	<p style="text-align: right;">Page 119</p> <p>1 A. Correct. 2 Q. And what would -- what would be the effect of 3 overstretching those lines or potential effect? How did 4 that -- how do you think that that led to the fire? 5 A. Well, the conductors just haven't been -- the 6 triplex hasn't been replaced -- 7 THE REPORTER: Wait a minute. Wait a 8 minute. Start that answer over, please. 9 A. The triplex has not been replaced in several 10 years according to that transformer, and that 11 installation is corroded from the electricity flowing 12 through the conductors and the sunlight on those 13 conductors. That will make it crack after a period of 14 time. The insulation falls off, you'll have a hot 15 touching on a neutral conductor or a grounded conductor 16 and that will cause a fire. 17 Q. Okay. Would -- would weather contribute to -- 18 to -- to that as well? 19 A. Yes, the sunlight will. 20 Q. The sunlight. How about -- how about wind, 21 water? 22 A. Wind can do it. 23 Q. Okay. 24 A. And once the insulation comes off those 25 conductors that are energized, that water is conductive</p>
<p style="text-align: right;">Page 118</p> <p>1 loose, and in this case what you're saying is the 2 service -- the service drop -- there is no drop, I 3 guess. You're saying it's too tight? 4 A. It's too tight once they transport those lines 5 to that new pole. 6 Q. Okay. And -- and do you -- what -- can you -- 7 can you explain to the jury where the -- where the 8 service entrance or service drop is to -- to Mr. Cude's 9 residence? 10 A. It's not on this picture, but it's to the left 11 of the picture. 12 Q. Okay. All right. So to the left of the 13 picture those -- those lines that are -- 14 A. One's going to Walt Cude's house and the other 15 one is going to his neighbor's house. 16 Q. Okay. And those are the lines on left side of 17 the picture; is that correct? 18 A. Right. 19 Q. Okay. And so those lines -- correct me if I'm 20 wrong here, but it's your opinion that those -- that 21 those lines were stretched too tight -- 22 A. Yes. 23 Q. -- when this installation was done. Okay. 24 And the fire, if I'm not mistaken, 25 occurred shortly after this, correct?</p>	<p style="text-align: right;">Page 120</p> <p>1 and they go across from the energized conductor to the 2 grounded conductor. They will start arcing and the 3 whole thing is energized. 4 Q. And is that -- based on your interviews, is 5 that what was observed the night of the fire? 6 A. That's what I observed after the fire. 7 Q. But you observed the triplex. But the 8 witnesses you talked to also said they -- they observed 9 arcing and sparking that was -- 10 A. Yes. 11 Q. -- with your analysis. 12 A. Yes. 13 Q. If it was a dark and stormy night with the 14 wind and rain, would that also contribute -- 15 A. Sure. 16 Q. -- to the arcing and the sparking that was 17 observed? 18 A. Yes. 19 Q. Okay. Mr. Winkfein, is there anything else, 20 any other -- anything else that we haven't talked about 21 that you -- you think is important? 22 A. No. I think we pretty much established 23 everything. 24 Q. Yeah, I have to ask, are you being compensated 25 for your testimony today in any way?</p>

<p style="text-align: right;">Page 121</p> <p>1 A. No.</p> <p>2 Q. What did you do to prepare for your deposition</p> <p>3 today?</p> <p>4 A. Just from back knowledge.</p> <p>5 Q. All right. I'm going to take a quick, short</p> <p>6 break, if you don't mind. And I think I -- I think I'm</p> <p>7 done for now, but I just want to look back at -- look at</p> <p>8 my notes and -- I may have some follow-up questions as well.</p> <p>9 I believe Don -- I'm guessing Don has some questions for</p> <p>10 you, but if you guys will give me just a couple minutes,</p> <p>11 I would appreciate it.</p> <p>12 A. Okay.</p> <p>13 Q. All right.</p> <p>14 THE VIDEOGRAPHER: Off the record, Mr.</p> <p>15 Swallow?</p> <p>16 MR. SWALLOW: Yes, sir, just give me a</p> <p>17 couple minutes off the record.</p> <p>18 THE VIDEOGRAPHER: Okay. The time is 1</p> <p>19 -- the time is 1:41 p.m. We are off the record.</p> <p>20 (Break from 1:41 to 1:53 p.m.)</p> <p>21 THE VIDEOGRAPHER: The time is 1:53 p.m.</p> <p>22 We are now on the record.</p> <p>23 EXAMINATION</p> <p>24 BY MR. SCHAUER:</p> <p>25 Q. Mr. Winkfein, are you ready to continue?</p>	<p style="text-align: right;">Page 123</p> <p>1 Q. And when did that happen?</p> <p>2 A. That's been within the last month or two.</p> <p>3 Q. Okay. And how did you get over to his house</p> <p>4 today?</p> <p>5 A. I drove over there myself.</p> <p>6 Q. Okay. And did you get there what time?</p> <p>7 A. I probably got to his house about 10 minutes</p> <p>8 to 9.</p> <p>9 Q. Okay. So you were there a little over an hour</p> <p>10 before we started.</p> <p>11 A. Correct.</p> <p>12 Q. Okay. How about any of his attorneys, have</p> <p>13 you spoken to any of his attorneys about this</p> <p>14 deposition?</p> <p>15 A. I talked to him previously, yes.</p> <p>16 Q. And when was the last time you talked to</p> <p>17 him?</p> <p>18 A. I talked to him yesterday.</p> <p>19 Q. Okay. What did you talk about?</p> <p>20 A. What we were reviewing over today.</p> <p>21 Q. Okay. Did they tell you about the questions</p> <p>22 they were going to ask you today?</p> <p>23 A. Pretty much.</p> <p>24 Q. How much -- long did you spend with him?</p> <p>25 A. Oh, I'd say about two or three hours.</p>
<p style="text-align: right;">Page 122</p> <p>1 A. Yes.</p> <p>2 Q. Okay.</p> <p>3 A. Oh, another one.</p> <p>4 Q. I'm sorry?</p> <p>5 A. Let's do it.</p> <p>6 Q. Okay. Well, my name is Don Schauer. I</p> <p>7 represent AEP Texas in this case. I have a few</p> <p>8 questions for you today.</p> <p>9 A. Sure.</p> <p>10 Q. Now, a while ago Mr. Swallow asked you what</p> <p>11 you had done to prepare for your deposition, and you</p> <p>12 said something and I got to tell you, my hearing is not</p> <p>13 great. What did you tell him?</p> <p>14 A. As far as a deposition, I'm just going through</p> <p>15 my back knowledge from all the experience I've had</p> <p>16 throughout the years.</p> <p>17 Q. Okay. But did you -- did you look at any</p> <p>18 documents before you got here today to remind yourself</p> <p>19 what -- what had happened?</p> <p>20 A. No, I've already seen them.</p> <p>21 Q. Okay. Okay. Who did you speak to before you</p> <p>22 did your deposition today? Did you speak -- I know you</p> <p>23 spoke with Mr. Cude because you rode around with him and</p> <p>24 took photos, right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. Okay. Did you spend with -- any time with him</p> <p>2 before yesterday?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. And how -- how much time did you spend</p> <p>5 with him before and when was that?</p> <p>6 A. It's approximately -- approximately about the</p> <p>7 same amount of time. It's probably been -- well, I'd</p> <p>8 say about a month ago.</p> <p>9 Q. Okay. About two or three hours you spent with</p> <p>10 him then too?</p> <p>11 A. Yeah.</p> <p>12 Q. Okay. Any time before that?</p> <p>13 A. I think that's pretty much it.</p> <p>14 Q. Okay. So you spent a total of about four to</p> <p>15 six hours with him getting ready for the deposition; is</p> <p>16 that right?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. Let me get some information about you.</p> <p>19 What is your date of birth?</p> <p>20 A. 8-16-1948.</p> <p>21 Q. Okay. So that makes you about 72?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. All right, sir. I think you've told us</p> <p>24 your address. You said you've lived there about 11</p> <p>25 years in that subdivision; is that correct?</p>

Page 125

1 **A. Correct.**

2 Q. Okay. Now, you told us about the work you did

3 for Mr. Cude on this house. Had you ever done any work

4 for him before you worked on that house?

5 **A. No.**

6 MR. SCHAUER: Okay. Now, Jonathan, if

7 you'll pull up Exhibit Number 1.

8 THE VIDEOGRAPHER: Sure, just a moment.

9 MR. SCHAUER: Okay.

10 THE VIDEOGRAPHER: Ah. Okay, there we

11 go. Okay. Can you guys see that okay?

12 MR. SCHAUER: Yeah, I can.

13 And, Sandy, I don't know how you want to

14 do this. I guess you could just do this Defense Exhibit

15 1. I don't know.

16 THE REPORTER: Yes, that would be fine.

17 MR. SCHAUER: Okay.

18 Q. (BY MR. SCHAUER) Mr. Winkfein, this is a

19 cross-notice of your deposition with a subpoena attached

20 to it. Have you ever seen this document?

21 **A. I can't say that I have.**

22 Q. Okay. Jonathan, if you'll scroll down to

23 the -- the page that's attached. Keep going. There you

24 go.

25 Mr. Winkfein, this is a list of documents

Page 126

1 that you were asked to bring with your deposition today

2 or supply before your deposition. Have you ever

3 reviewed this list?

4 **A. Let me look here just a minute.**

5 Q. Sure.

6 **A. I think I signed some paper for this one time.**

7 Q. Okay. You were asked to bring these documents

8 today. As far as you know, have you brought everything

9 that's listed in this list?

10 **A. I don't have anything like that on me**

11 **personally, no.**

12 Q. Okay. But when you say personally, you don't

13 have it with you right there at Mr. Cude's house, but is

14 some of this stuff you think could be at your home?

15 **A. I don't have it in my home.**

16 Q. You don't have anything in your home?

17 **A. No.**

18 MR. SCHAUER: Okay. All right. Okay.

19 Let's go to -- let's go to Exhibit 2, Jonathan, please.

20 THE VIDEOGRAPHER: Okay. Just a second.

21 Okay. Here it is.

22 Q. Okay. Now, Mr. Winkfein, I think we looked at

23 this a while ago. This is your first report. Do you

24 remember this?

25 **A. Yes.**

Page 127

1 Q. And I think you were asked when you wrote it

2 and you couldn't remember, but Jonathan, if you'll

3 scroll down to the bottom.

4 **A. That's the paper I signed.**

5 Q. Yeah. Well, you see it's notarized on October

6 30th, 2019. Do you see that?

7 **A. Yes.**

8 Q. Does that re- -- kind of refresh your memory

9 as to when you signed this?

10 **A. Yes, I remember signing that.**

11 Q. Okay. Who prepared this document?

12 **A. I think Mr. Cude did.**

13 Q. Mr. Cude typed it up for you?

14 **A. Yes. I don't type.**

15 Q. Okay. And do you know the reason you -- you

16 signed this document on October 30, 2019? What was the

17 purpose?

18 **A. This -- what's going on today, this**

19 **deposition.**

20 Q. Well, did -- well, did Mr. Cude tell you that

21 at the time the lawsuit had not been filed?

22 **A. I thought it was already being filed. I have**

23 **no recollection of that.**

24 Q. Okay. But was your understanding you were

25 doing this because of a lawsuit?

Page 128

1 **A. Yes.**

2 Q. Okay. So I think --

3 MR. SCHAUER: Okay. Jonathan, could you

4 come back up to the body of it, please? Okay. That's

5 good. That's good. That's good.

6 Q. Okay. So I want to go through this -- this

7 first one you have here. It says, of course, that when

8 he purchased the house. Now, you've told us you did

9 this work in 2011; is that correct?

10 **A. Correct.**

11 Q. Had he just purchased the house in 2011?

12 **A. It was -- he had -- it was in 2011 but it was**

13 **prior to when this happened.**

14 Q. Wait a minute. I'm not sure I understand.

15 Oh, he -- you mean to tell me he had purchased the house

16 before 2011?

17 **A. Well, he had purchased the house before I even**

18 **went over to his house to install that new service.**

19 Q. Yeah. Well, I know -- you told us you did

20 that new service at -- at what time?

21 **A. It was after that time when he bought that**

22 **house, whenever he bought the house. I don't know**

23 **exactly what the date was when he bought that house.**

24 Q. Okay. When you first went over there to -- to

25 do the work, what did the house look like?

<p style="text-align: right;">Page 129</p> <p>1 A. The electrical panel -- panel outside, the</p> <p>2 service was a mess.</p> <p>3 Q. Okay. Had somebody lived there before him</p> <p>4 lately?</p> <p>5 A. I think there was somebody there prior to</p> <p>6 that, yes.</p> <p>7 Q. Was he living in the house at the time you</p> <p>8 went over there to look at it the first time?</p> <p>9 A. Well, Cude was.</p> <p>10 Q. Okay. So he didn't have the house that you're</p> <p>11 sitting in right now at the time or did he?</p> <p>12 A. The house I'm sitting in right now, he did</p> <p>13 have this house.</p> <p>14 Q. Okay. So he had the one you're sitting in and</p> <p>15 he had the one that burned down, both, correct?</p> <p>16 A. Correct.</p> <p>17 Q. Did they -- did he buy them at the same time,</p> <p>18 or do you know?</p> <p>19 A. He didn't buy them at the same time. He</p> <p>20 bought the one I'm sitting in first.</p> <p>21 Q. Okay. And did you know him before he bought</p> <p>22 that second house?</p> <p>23 A. Excuse -- excuse me -- excuse -- excuse me</p> <p>24 just a minute.</p> <p>25 (Phone interruption.)</p>	<p style="text-align: right;">Page 131</p> <p>1 Q. Why was it necessary to install a 200-amp</p> <p>2 rather than a 100-amp?</p> <p>3 A. Everything in that house and things he was</p> <p>4 projected to add onto that house.</p> <p>5 Q. Okay. So he told you what his future plans</p> <p>6 were and it was going to necessitate something greater</p> <p>7 than a hundred-amp box?</p> <p>8 A. Yes.</p> <p>9 Q. Did he tell you what he intended to put in</p> <p>10 there?</p> <p>11 A. Just a bunch of equipment for woodworking and</p> <p>12 sanding and things of that type.</p> <p>13 Q. Okay. Now, it says that the panel was</p> <p>14 grounded according to Texas code to a ground rod. And</p> <p>15 when you say Texas code, you're talking about the</p> <p>16 National Electric Code, right?</p> <p>17 A. Right.</p> <p>18 Q. Okay. Now, tell us, what's the purpose of the</p> <p>19 ground rod?</p> <p>20 A. It takes ground fault that you have -- if you</p> <p>21 have ground faults in your house, it takes your grounds</p> <p>22 to the ground.</p> <p>23 Q. In other words, the power is directed into the</p> <p>24 ground rather than the house?</p> <p>25 A. Correct.</p>
<p style="text-align: right;">Page 130</p> <p>1 A. Sure. My nurse.</p> <p>2 Q. Okay.</p> <p>3 A. Yeah, I knew him -- I knew him when he had</p> <p>4 this house, and I knew him when he bought that house.</p> <p>5 Q. Okay. Did -- did you -- did you go down and</p> <p>6 look at that house before he purchased it?</p> <p>7 A. No.</p> <p>8 Q. Okay. When you went down there to work on it,</p> <p>9 when he asked you to do the work on it, did you go</p> <p>10 inside the house?</p> <p>11 A. Yes.</p> <p>12 Q. What did it look like in there?</p> <p>13 A. It's just a house that's been sitting there</p> <p>14 for quite awhile. I don't think anybody has lived in</p> <p>15 there in a while, but there was people that was living</p> <p>16 in it. I think they was wrestlers, according to</p> <p>17 Mr. Cude. I don't know that far back. And we went</p> <p>18 around looking at the inside, outside. And I told him</p> <p>19 he needed to replace that outside panel because that</p> <p>20 was -- something -- a very bad panel box which needed to</p> <p>21 be corrected.</p> <p>22 Q. Okay. Now, you say in your report here that</p> <p>23 you installed a 200-amp Cutler hammer main panel,</p> <p>24 correct?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Okay. What section of the NEC, National</p> <p>2 Electric Code, governs the grounding of a panel like</p> <p>3 that with a ground rod?</p> <p>4 A. Article 250.</p> <p>5 Q. Okay. What type of rod is required?</p> <p>6 A. A 5/8 by 8 foot ground rod.</p> <p>7 Q. And where is it supposed to be installed?</p> <p>8 A. Right below the meter.</p> <p>9 Q. Did the old service entrance have a ground rod</p> <p>10 installed?</p> <p>11 A. I don't think it did. It's got one now, or it</p> <p>12 did have one. But it's still in the ground.</p> <p>13 Q. Well, that's what I was going to ask you. Did</p> <p>14 you install a new -- a new ground rod?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. So you put in a new panel in the same</p> <p>17 location as the old one; is that correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. Did you use the same weatherhead and</p> <p>20 the same riser, or did you install new ones?</p> <p>21 A. Installed new.</p> <p>22 Q. Okay. How about the meter enclosure, did you</p> <p>23 reuse the one that was there or you install a new meter</p> <p>24 enclosure?</p> <p>25 A. New -- new one.</p>

<p style="text-align: right;">Page 133</p> <p>1 Q. Okay. Was the meter still inserted in the</p> <p>2 meter enclosure when you started working on it?</p> <p>3 A. It was removed from AEP.</p> <p>4 Q. So you're telling me AEP had come out and</p> <p>5 removed the meter?</p> <p>6 A. Right.</p> <p>7 MR. SCHAUER: Okay. Now, let me ask.</p> <p>8 Jonathan, will you go to Exhibit 3, please?</p> <p>9 THE VIDEOGRAPHER: Yes, just a second.</p> <p>10 Q. (BY MR. SCHAUER) Okay. Do you remember,</p> <p>11 we've looked at this Mr. Winkfein, correct?</p> <p>12 A. Correct.</p> <p>13 Q. And this is a photo that Mr. Cude took of his</p> <p>14 panel, right?</p> <p>15 A. Right.</p> <p>16 Q. Okay. Can you tell if this -- right after you</p> <p>17 installed it, or was it taken later, or do you know?</p> <p>18 A. I don't know when he took that picture.</p> <p>19 Q. Okay. Well, just so we can get oriented for</p> <p>20 the folks on the jury, the meter -- the meter enclosure</p> <p>21 or some people call the meter can, is over here on the</p> <p>22 right-hand side, correct?</p> <p>23 A. Correct.</p> <p>24 Q. And so you're telling me that at the time you</p> <p>25 put this in -- well, there's no meter because you put in</p>	<p style="text-align: right;">Page 135</p> <p>1 is that correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. Now, you were talking about installing</p> <p>4 the ground rod. Tell us how you installed and where you</p> <p>5 installed that ground rod.</p> <p>6 A. Right below that meter.</p> <p>7 Q. And how do you install it? What do you attach</p> <p>8 to it?</p> <p>9 A. I attached the ground wire that's coming out</p> <p>10 of that meter, and I take it to a piece of conduit</p> <p>11 fastened to the wall, and the ground rod itself I used</p> <p>12 like I used for fence post drivers. I'd drive it down</p> <p>13 so far with that and I use a sledge hammer to get it</p> <p>14 down, within a couple inches of the service, and I</p> <p>15 attach a ground flat to that ground wire to the ground.</p> <p>16 Q. Okay. The ground wire you attached to the</p> <p>17 ground rod underneath the meter enclosure, we can't see</p> <p>18 that in this photo, can we?</p> <p>19 A. No.</p> <p>20 Q. Okay. Now, the two black wires we talked</p> <p>21 about that go up to the top of the meter and loop</p> <p>22 around, those are inserted into that surge protector; is</p> <p>23 that correct?</p> <p>24 A. That's going into a main 200-amp breaker. The</p> <p>25 surge protector is going off another breaker inside that</p>
<p style="text-align: right;">Page 134</p> <p>1 a new meter enclosure, right?</p> <p>2 A. Right.</p> <p>3 Q. Okay. So the whole house was de-energized by</p> <p>4 that time, right?</p> <p>5 A. Right.</p> <p>6 Q. Do you know when the matter was pulled?</p> <p>7 A. I think it was about the same day I put this</p> <p>8 on. Just made a phone call and they come out and pulled</p> <p>9 it.</p> <p>10 Q. Okay. So AEP came out and pulled the meter</p> <p>11 because the meter belongs to them, right?</p> <p>12 A. Right.</p> <p>13 Q. But everything else over here belongs to the</p> <p>14 customer, correct?</p> <p>15 A. Right.</p> <p>16 Q. Okay. Now, if we look in the -- at the bottom</p> <p>17 we see there are three wires that are coming from the</p> <p>18 meter enclosure into the new breaker box you installed,</p> <p>19 correct?</p> <p>20 A. Correct.</p> <p>21 Q. The two black wires that go up to the very</p> <p>22 top, those are hot legs, right, those are hot wires.</p> <p>23 A. Right.</p> <p>24 Q. And the green, this -- it's not very good on</p> <p>25 this, but I think it's a green wire, is the ground wire;</p>	<p style="text-align: right;">Page 136</p> <p>1 panel.</p> <p>2 Q. Okay. Well, the surge protector is that thing</p> <p>3 with the blue and red at the top, correct?</p> <p>4 A. That top breaker is the main breaker for that</p> <p>5 panel.</p> <p>6 Q. Okay.</p> <p>7 A. That's not a surge protector.</p> <p>8 Q. Where is the surge protector located?</p> <p>9 A. It's probably at the bottom of that panel box.</p> <p>10 Q. Oh, we can't see that either?</p> <p>11 A. No.</p> <p>12 Q. Okay.</p> <p>13 MR. SCHAUER: Jonathan, can you scroll</p> <p>14 up? Other way.</p> <p>15 Q. (BY MR. SCHAUER) I don't see anything in the</p> <p>16 bottom there, Mr. Winkfein.</p> <p>17 A. It's there; you just can't see it.</p> <p>18 Q. Well, you said it's on the bottom of the meter</p> <p>19 -- excuse me, on the bottom of the breaker box?</p> <p>20 A. It was. That -- that may have been installed</p> <p>21 after that picture was taken.</p> <p>22 Q. Okay. But let's make sure I understand. So</p> <p>23 if you'd -- you'd installed this surge protector at the</p> <p>24 bottom, you'd lay it on the bottom of the meter box?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 137</p> <p>1 Q. I'm sorry, the breaker box.</p> <p>2 A. It'd be under the breaker box.</p> <p>3 Q. Okay.</p> <p>4 A. Your breaker is -- it goes to a breaker inside</p> <p>5 that panel.</p> <p>6 Q. And is it connected to the wires that are</p> <p>7 coming in from the meter can?</p> <p>8 A. No. It just goes onto the bus bar inside that</p> <p>9 panel.</p> <p>10 Q. Okay. And so how does the -- how does the</p> <p>11 surge protector work?</p> <p>12 A. If you have any kind of surge, it is supposed</p> <p>13 to trip that main breaker.</p> <p>14 Q. Okay. And the main -- tripping the main</p> <p>15 breaker cuts all the electricity to the household,</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. Okay.</p> <p>19 MR. SCHAUER: Jonathan, with you bring up</p> <p>20 Exhibit 5, please?</p> <p>21 THE VIDEOGRAPHER: Just a second. Okay.</p> <p>22 Q. (BY MR. SCHAUER) Now, Mr. Winkfein, this is</p> <p>23 some information I got off of Eaton's website, and it's</p> <p>24 talking about their whole house surge protectors.</p> <p>25 That's what you installed, correct?</p>	<p style="text-align: right;">Page 139</p> <p>1 back to Exhibit 2 which is the photo of the breaker box.</p> <p>2 THE VIDEOGRAPHER: Okay. Just a second.</p> <p>3 This is Exhibit 2. I don't see a box in here.</p> <p>4 MR. SCHAUER: And I was wrong. That's --</p> <p>5 that's the one I want. That's the one I want. I'm</p> <p>6 sorry.</p> <p>7 THE VIDEOGRAPHER: Okay, no problem.</p> <p>8 Q. (BY MR. SCHAUER) Okay. Okay. So I'm going</p> <p>9 to go a little further down here now. The second</p> <p>10 paragraph, Mr. Winkfein. You said while inspecting the</p> <p>11 house after the fire, I discussed discovered melted</p> <p>12 triplex wires laying across the driveway. Said triplex,</p> <p>13 it also landed upon one vehicle causing it to explode</p> <p>14 and burn as well, along with a large wooden fence.</p> <p>15 When you observed this, was the triplex</p> <p>16 still attached to the home?</p> <p>17 A. They had a short piece where it had burned in</p> <p>18 half.</p> <p>19 Q. So you're telling me it was not attached to</p> <p>20 the home because it burnt in half, correct?</p> <p>21 A. It was attached to the home, but it burned in</p> <p>22 half when it had the fire from that triplex.</p> <p>23 Q. And that's what I'm trying to understand.</p> <p>24 When you went there and saw it the next day or whenever</p> <p>25 you went, I think you said a couple of days, the triplex</p>
<p style="text-align: right;">Page 138</p> <p>1 A. That's correct.</p> <p>2 Q. And it says here in yellow, the Eaton surge</p> <p>3 products are designed to provide protection at the point</p> <p>4 of entrance to the home. Excuse me.</p> <p>5 Protection at this location can reduce</p> <p>6 surges entering the home to an acceptable level for your</p> <p>7 home electronics and appliances. Is that what that</p> <p>8 says?</p> <p>9 A. That's exactly what it says.</p> <p>10 Q. And the next one says, Installation of these</p> <p>11 devices at the service entrance panel, which is where</p> <p>12 you installed it, correct?</p> <p>13 A. Correct.</p> <p>14 Q. Will provide surge protection for your entire</p> <p>15 home. Right?</p> <p>16 A. Right.</p> <p>17 Q. Okay. So that was your intent for putting</p> <p>18 this in, was to protect that home from any electrical</p> <p>19 surges that came into the box, correct?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. Let me ask you, did you suggest that to</p> <p>22 Mr. Cude, or did Mr. Cude request you put that in?</p> <p>23 A. He requested that.</p> <p>24 Q. Okay.</p> <p>25 MR. SCHAUER: Jonathan, if you'll go now</p>	<p style="text-align: right;">Page 140</p> <p>1 was no longer attached to the home, correct?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. It -- but it was still attached to the</p> <p>4 -- the service pole, correct?</p> <p>5 A. Part of it.</p> <p>6 Q. Well, it was coming down the service pole and</p> <p>7 hanging on the ground, wasn't it?</p> <p>8 A. Yeah.</p> <p>9 Q. Okay. Now, when you went over there to</p> <p>10 inspect the house, why did you go over there? Did</p> <p>11 Mr. Cude ask you to do that?</p> <p>12 A. I just went over to see what the damage was.</p> <p>13 Q. Okay. Did you take any evidence or anything</p> <p>14 from the fire scene?</p> <p>15 A. No.</p> <p>16 Q. Okay. Were you with Mr. Cude when he took the</p> <p>17 breaker panel from the fire scene?</p> <p>18 A. No.</p> <p>19 Q. And you were asked about what happened to the</p> <p>20 individual breakers. You said they just burned up?</p> <p>21 A. Yes.</p> <p>22 Q. But when you were there that day the first</p> <p>23 time, was the breaker panel there, or had he already</p> <p>24 taken it or do you remember?</p> <p>25 A. I don't see him taking it that particular day,</p>

<p style="text-align: right;">Page 141</p> <p>1 and I wasn't looking -- I didn't see that panel laying</p> <p>2 there at the time.</p> <p>3 Q. Okay.</p> <p>4 A. I was mainly in the part that burned down just</p> <p>5 looking around through the rubble.</p> <p>6 Q. Okay. And I -- I guess I'm not sure what you</p> <p>7 said. You didn't look for the breaker panel so you</p> <p>8 don't know if it was still there that day?</p> <p>9 A. I don't know if it was or not.</p> <p>10 Q. Okay. All right. So we're going down a</p> <p>11 little further and it says, When the service pole was</p> <p>12 replaced some two months prior to the fire, the aerial</p> <p>13 triplex was mechanically stretched beyond its limits.</p> <p>14 Okay?</p> <p>15 A. Okay.</p> <p>16 Q. Did you see the service pole being replaced</p> <p>17 after the hurricane Harvey?</p> <p>18 A. Yes.</p> <p>19 Q. You were there when they were actually</p> <p>20 replacing it?</p> <p>21 A. Yes.</p> <p>22 Q. And you were there when he was taking the</p> <p>23 photos? Was that Mr. Cude taking the photos?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. So you were there when it was being</p>	<p style="text-align: right;">Page 143</p> <p>1 Q. But you told him it was stretched too tight</p> <p>2 you just told us.</p> <p>3 A. Yes. And he told me the same thing his self.</p> <p>4 Q. So he knew at that time right after the</p> <p>5 replacement of the pole that there could have been</p> <p>6 something wrong with the triplex. Is that what you're</p> <p>7 telling me?</p> <p>8 A. He's telling me that something is wrong with</p> <p>9 the triplex because it was stretched too long.</p> <p>10 Q. Okay. All right.</p> <p>11 MR. SCHAUER: Jonathan, if you'll go back</p> <p>12 now to Exhibit 3, which is that photo, please.</p> <p>13 THE VIDEOGRAPHER: Okay.</p> <p>14 Q. (BY MR. SCHAUER) All right. We're back at</p> <p>15 Exhibit 3. We're looking at this -- this breaker box</p> <p>16 that you installed, Mr. Winkfein.</p> <p>17 Now, the two black wires that are going</p> <p>18 in the top here, okay --</p> <p>19 A. Correct.</p> <p>20 Q. -- are those Number 4?</p> <p>21 A. These two ought wires.</p> <p>22 Q. Okay. Two ought. Okay. The voltage between</p> <p>23 one of those black wires and a ground is 120 volts,</p> <p>24 right?</p> <p>25 A. Right.</p>
<p style="text-align: right;">Page 142</p> <p>1 replaced, and you're saying they replaced it, the one</p> <p>2 that was there, because that one was there was rotten,</p> <p>3 or was it because of the hurricane had damaged it?</p> <p>4 A. I think a little of both.</p> <p>5 Q. Okay. So were you there when they finished</p> <p>6 replacing the pole and re-putting up the triplex?</p> <p>7 A. I was there when they had the pole installed.</p> <p>8 I come over there after they had the triplex already</p> <p>9 stretched out.</p> <p>10 Q. Okay. You came over there later. How many</p> <p>11 days later after the pole was installed?</p> <p>12 A. He installed about two or three days.</p> <p>13 Q. Okay. Did you notice anything unusual about</p> <p>14 the triplex at that time?</p> <p>15 A. It was stretched too tight.</p> <p>16 Q. Did you tell anything -- did you tell Mr. Cude</p> <p>17 about that?</p> <p>18 A. Yes.</p> <p>19 Q. What did he say?</p> <p>20 A. Nothing to me. I don't know if he got back</p> <p>21 the day he came or not.</p> <p>22 Q. Okay. Would you have expected him to if he</p> <p>23 had found a problem?</p> <p>24 A. If he ever found a problem and know what he's</p> <p>25 looking at, he would have called AEP.</p>	<p style="text-align: right;">Page 144</p> <p>1 Q. The voltage between the two black wires is</p> <p>2 240, right?</p> <p>3 A. Right.</p> <p>4 MR. SCHAUER: Jonathan, will you scroll</p> <p>5 up to the bottom, please?</p> <p>6 THE VIDEOGRAPHER: Sure.</p> <p>7 Q. (BY MR. SCHAUER) Now, do you see those white</p> <p>8 -- white wires down here in the corner, in the bottom?</p> <p>9 A. Yeah.</p> <p>10 Q. What circuit in the house is that for?</p> <p>11 A. They used to go to an air conditioner, and</p> <p>12 they're not -- they wouldn't splay [sic] that particular</p> <p>13 air conditioner anymore, so they just rolled up.</p> <p>14 Q. Well, are they going anywhere into the house</p> <p>15 or not?</p> <p>16 A. No, it was -- they was going to the outside</p> <p>17 air conditioning unit around that conduit. It was</p> <p>18 disconnected.</p> <p>19 Q. So you're not -- you aren't using these wires</p> <p>20 for anything in his house after that.</p> <p>21 A. No.</p> <p>22 Q. Okay. All right. Just so we know that the</p> <p>23 greatest voltage you can get into this house is 240</p> <p>24 volts, right?</p> <p>25 A. Well, 240 volts is a flex (unintelligible) the</p>

<p style="text-align: right;">Page 145</p> <p>1 curve. It will go up a little bit and then come down a</p> <p>2 little bit.</p> <p>3 Q. Well, it's 240 volts nominal. It may go up a</p> <p>4 little bit, you know, five volts either way, correct?</p> <p>5 A. Correct.</p> <p>6 Q. But we're not going to get much over 240, 245</p> <p>7 volts, right?</p> <p>8 A. That's the way it should be.</p> <p>9 Q. And that's because that's the service --</p> <p>10 that's what comes from the transformer, right?</p> <p>11 A. Right.</p> <p>12 Q. Okay.</p> <p>13 MR. SCHAUER: Okay. Jonathan, will you</p> <p>14 go to Exhibit Number 6, please?</p> <p>15 THE VIDEOGRAPHER: Yes. Okay.</p> <p>16 Q. (BY MR. SCHAUER) Okay. You remember this --</p> <p>17 this photograph that we looked at earlier, Mr. Winkfein?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And I think this photo was taken by</p> <p>20 Mr. Cude; is that correct?</p> <p>21 A. That would be correct.</p> <p>22 Q. Okay. Now, this is part of a distribution</p> <p>23 system, correct?</p> <p>24 A. Correct.</p> <p>25 Q. Is this a delta or a Y distribution system?</p>	<p style="text-align: right;">Page 147</p> <p>1 it up and you signed it; is that correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. It doesn't have a date on it so I'm --</p> <p>4 I'm wondering if you know when you signed this.</p> <p>5 A. This has probably been -- this may not -- I'd</p> <p>6 probably say about a year, two years ago.</p> <p>7 MR. SCHAUER: Okay. Jonathan, can you</p> <p>8 scroll -- scroll down a little bit, please? All right.</p> <p>9 Right there. That's correct. Stop. Please. Thank</p> <p>10 you.</p> <p>11 Q. (BY MR. SCHAUER) Now, this last paragraph on</p> <p>12 this first page -- and I think you've told us you</p> <p>13 inspected this whole house inside and out, correct?</p> <p>14 A. Correct.</p> <p>15 Q. And you replaced -- I thought you said you</p> <p>16 replaced some of the switches and some of the</p> <p>17 receptacles. Did you replace every one of them?</p> <p>18 A. No.</p> <p>19 Q. Okay. So this is -- this is not -- this is</p> <p>20 not correct then, correct?</p> <p>21 A. Well, some of them did not need replacing.</p> <p>22 Some of them did.</p> <p>23 Q. Okay. But you didn't replace all of them in</p> <p>24 the house, right?</p> <p>25 A. Right.</p>
<p style="text-align: right;">Page 146</p> <p>1 A. Y.</p> <p>2 Q. And it's Y because what?</p> <p>3 A. It's just got one line going to it that you</p> <p>4 don't have no piling on this particular transformer.</p> <p>5 Q. But it's also got a ground, doesn't it?</p> <p>6 A. Yes.</p> <p>7 Q. And that's what makes it a Y distribution</p> <p>8 system rather than a delta, correct?</p> <p>9 A. That and the windings in that transformer.</p> <p>10 Q. Okay. But this has -- this particular setup</p> <p>11 is a Y distribution system with a ground, right?</p> <p>12 A. Right.</p> <p>13 Q. Okay. I want to go to your second report now.</p> <p>14 MR. SCHAUER: Jonathan, would you pull up</p> <p>15 Exhibit Number 7?</p> <p>16 THE VIDEOGRAPHER: Okay, just a second.</p> <p>17 Okay.</p> <p>18 Q. (BY MR. SCHAUER) Okay. Mr. Winkfein, this is</p> <p>19 your second report, correct?</p> <p>20 A. I recall seeing this, yes.</p> <p>21 Q. Okay. Well, actually, when did you write</p> <p>22 this? Do you know?</p> <p>23 A. I didn't write it. I think Mr. Cude wrote</p> <p>24 this and typed it up.</p> <p>25 Q. Okay. So he typed -- he -- he wrote it, typed</p>	<p style="text-align: right;">Page 148</p> <p>1 Q. Okay. And it says here you put in the surge</p> <p>2 protector at the request of Mr. Cude; is that correct?</p> <p>3 A. That's correct.</p> <p>4 Q. Okay. All right. Now, you didn't replace any</p> <p>5 of the Romex in the walls, right?</p> <p>6 A. Right.</p> <p>7 Q. Okay. So you used the same wiring, correct?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. Did -- did he pay for all the material,</p> <p>10 or did you have to buy it and get money back from him?</p> <p>11 A. I bought the wire at my supply house and Walt</p> <p>12 reimbursed me on it.</p> <p>13 Q. It says at the very last sentence, I also</p> <p>14 installed a Cutler hammer sub panel for the shop area.</p> <p>15 And we -- we've sort of talked about that, haven't we?</p> <p>16 A. Yeah.</p> <p>17 Q. Okay. Why was the subpanel needed?</p> <p>18 A. As far as work area, he was going to install</p> <p>19 some of the scenery in that area. The only thing I did</p> <p>20 out there was hooked up an air compressor and added two</p> <p>21 or three receptacles in that area where he can plug in</p> <p>22 extension cords.</p> <p>23 Q. Well, I guess the question is why would he</p> <p>24 have needed a subpanel? Why couldn't he have just used</p> <p>25 the receptacles in the house?</p>

<p style="text-align: right;">Page 149</p> <p>1 A. He had equipment. He was going to have like</p> <p>2 bandsaws, tablesaws. That's something you use outside.</p> <p>3 You don't normally take that inside of a house.</p> <p>4 Q. Are you -- are you telling us the load was</p> <p>5 going to be heavier out there?</p> <p>6 A. No, I'm telling you that you just don't use</p> <p>7 that type of equipment inside of a house. You work --</p> <p>8 you use that out -- out in an area where it's not inside</p> <p>9 the house. There's too much metal or dust lying around.</p> <p>10 Q. Okay. And you said that you hooked up an air</p> <p>11 compressor and a bandsaw?</p> <p>12 A. Only thing I hooked up in that moment was a</p> <p>13 air compressor and a couple of receptacles where he can</p> <p>14 plug an extension in for his grills. That's the only</p> <p>15 thing that was installed in that.</p> <p>16 Q. Did -- did you see a kiln in there?</p> <p>17 A. There was one there but it was not installed</p> <p>18 or hooked up.</p> <p>19 Q. Okay. Do you know why there was a kiln in</p> <p>20 there?</p> <p>21 A. He had bought a (unintelligible). He was</p> <p>22 selling a lot of things since he moved.</p> <p>23 Q. Okay. Was the kiln an electric kiln?</p> <p>24 A. It was electric.</p> <p>25 Q. Was everything in the house electric?</p>	<p style="text-align: right;">Page 151</p> <p>1 inspect the house?</p> <p>2 A. They just check all the service is what they</p> <p>3 do down at the meter. That's the only thing they</p> <p>4 inspect.</p> <p>5 Q. You're saying the only thing they inspect is</p> <p>6 at the meter. Is that what you just said?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And everything else beyond that you</p> <p>9 inspected, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. Were you there when they plugged the</p> <p>12 meter in?</p> <p>13 A. No, I wasn't.</p> <p>14 Q. Okay. Do you know what the tariff is?</p> <p>15 A. Tariff?</p> <p>16 Q. Have you ever heard of the tariff, utility</p> <p>17 tariff?</p> <p>18 A. Not right offhand, no.</p> <p>19 Q. Okay. Okay. And I think you told us that</p> <p>20 Live Oak County does not have an inspector for out in</p> <p>21 the rural areas; is that correct?</p> <p>22 A. That's correct.</p> <p>23 Q. So no one inspected your work, right?</p> <p>24 A. Right.</p> <p>25 Q. Okay. Now, the second sentence says, I</p>
<p style="text-align: right;">Page 150</p> <p>1 A. Yes.</p> <p>2 Q. Was there any provision for any type of</p> <p>3 natural gas or propane?</p> <p>4 A. I don't think so.</p> <p>5 Q. Okay.</p> <p>6 MR. SCHAUER: Jonathan, if you'll scroll</p> <p>7 up, please. No, I'm sorry, down. I'm sorry, Jonathan.</p> <p>8 Right there. No, no. I just want to get to the top.</p> <p>9 That -- okay, that's good, right there.</p> <p>10 Q. (BY MR. SCHAUER) Right there. Right there.</p> <p>11 Okay. Now, you say in this -- in this first full</p> <p>12 paragraph that -- that AEP inspected the wiring and</p> <p>13 installed a new meter into the structure. Do you see</p> <p>14 that?</p> <p>15 A. Yeah.</p> <p>16 Q. Well, you know AEP doesn't inspect the</p> <p>17 customer's equipment, correct?</p> <p>18 A. Correct.</p> <p>19 Q. So all AEP does is they come out, they make</p> <p>20 sure their meter can look good for the new meter and</p> <p>21 they plug the new meter in, correct?</p> <p>22 A. That and they take -- make sure it's grounded</p> <p>23 right.</p> <p>24 Q. Well, they don't inspect it. How are they</p> <p>25 going to -- how are they going to do that if they don't</p>	<p style="text-align: right;">Page 152</p> <p>1 further inspected the existing meter panel. You mean</p> <p>2 the meter enclosure?</p> <p>3 A. Yes.</p> <p>4 Q. Is that what that is? Okay.</p> <p>5 And determined that the wires inside</p> <p>6 protruding into the weatherhead had been present for</p> <p>7 many years and showed signs of corona. Do you see that?</p> <p>8 A. Yes.</p> <p>9 Q. Now, we talked about the maximum voltage</p> <p>10 gradient in these areas is 240 volts face-to-face,</p> <p>11 correct?</p> <p>12 A. Correct.</p> <p>13 Q. Is it your testimony that corona effects occur</p> <p>14 at these voltages?</p> <p>15 A. They affected any voltage.</p> <p>16 Q. Any voltage. Doesn't have to be high voltage.</p> <p>17 It's your testimony that corona can be established at</p> <p>18 any voltage; is that correct?</p> <p>19 A. That's correct.</p> <p>20 Q. Okay. Now, you say you replaced the wiring</p> <p>21 from the meter up through the weatherhead.</p> <p>22 A. Right.</p> <p>23 Q. And this is before the meter was installed,</p> <p>24 correct?</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 153</p> <p>1 Q. Okay. And then you talk about reconnecting</p> <p>2 the wires coming out of the weatherhead with the</p> <p>3 triplex; is that correct?</p> <p>4 A. That's correct.</p> <p>5 Q. So when you did that, you're connecting</p> <p>6 energized wires into the weatherhead, correct?</p> <p>7 A. Correct.</p> <p>8 Q. Do you always do that? Do you always connect</p> <p>9 the customer's wiring directly to the utility's hot</p> <p>10 lines?</p> <p>11 A. On some occasions I do. And other cases I</p> <p>12 don't.</p> <p>13 Q. Okay. Is it ever -- anyone ever pointed out</p> <p>14 to you that you're not supposed to touch the utility's</p> <p>15 lines?</p> <p>16 A. It just depends what I'm working on at the</p> <p>17 time. I'll get their permission from the power company.</p> <p>18 Q. Did you get your permission from AEP in</p> <p>19 this -- in this case?</p> <p>20 A. Yes.</p> <p>21 Q. Who did you talk to?</p> <p>22 A. I can't recall.</p> <p>23 Q. You got on the phone and you called AEP and</p> <p>24 said, I'm going to hook your lines up to this house?</p> <p>25 A. Yes. I don't know who I talked to.</p>	<p style="text-align: right;">Page 155</p> <p>1 Q. (BY MR. SCHAUER) So I want to focus now on</p> <p>2 that -- on that top paragraph here. While inspecting</p> <p>3 the house after the fire, I discovered melted triplex</p> <p>4 wires laying across the lawn and the driveway. I also</p> <p>5 saw the triplex which was connected to this weatherhead</p> <p>6 melted, broken, and bent over what was left of his</p> <p>7 house.</p> <p>8 Now, you told us before that the triplex</p> <p>9 melted in two, correct?</p> <p>10 A. Correct.</p> <p>11 Q. So you've got half of it laying over by the</p> <p>12 pole and half of it laying over by his weatherhead; is</p> <p>13 that correct?</p> <p>14 A. That is correct.</p> <p>15 Q. Okay. And then when you say that the triplex</p> <p>16 melted and fell from the house and on his vehicle,</p> <p>17 you're talking about the part of the triplex that was</p> <p>18 still connected to the service pole, correct?</p> <p>19 A. It was connected to AEP's pole, yes.</p> <p>20 Q. Because otherwise, the rest of the house is</p> <p>21 not energized anymore, correct?</p> <p>22 A. Correct.</p> <p>23 Q. Now, I think you told us you didn't take any</p> <p>24 photos. All the photos we've seen were Mr. Cude's,</p> <p>25 right?</p>
<p style="text-align: right;">Page 154</p> <p>1 Q. And was the meter already installed?</p> <p>2 A. I didn't have -- it was installed at the time.</p> <p>3 I didn't pull the meter out.</p> <p>4 Q. Well, you told us the meter had been pulled</p> <p>5 before you did all your upgrades, correct?</p> <p>6 A. Yes. And that's when I -- they came out and</p> <p>7 pulled the meter out. They didn't disconnect the lines</p> <p>8 up on top. Could hardly see what the wires looked like.</p> <p>9 Q. But you said you disconnected them, correct?</p> <p>10 A. I disconnected them, correct.</p> <p>11 Q. And then you correct -- and the meter is now</p> <p>12 in the meter can, correct?</p> <p>13 A. Not at that time.</p> <p>14 Q. Well, how -- how -- how much later after you</p> <p>15 connected those wires at the top of the weatherhead did</p> <p>16 the meter get reinstalled?</p> <p>17 A. I think that same day.</p> <p>18 Q. But you didn't ask the people from AEP to</p> <p>19 disconnect or unconnect -- excuse me -- disconnect or</p> <p>20 reconnect the triplex to the weatherhead wires. Is that</p> <p>21 what you're telling us?</p> <p>22 A. That is correct.</p> <p>23 MR. SCHAUER: Okay. Jonathan, if you'll</p> <p>24 scroll down a little bit this time. There you go.</p> <p>25 Right there. Right there. That's okay.</p>	<p style="text-align: right;">Page 156</p> <p>1 A. Right.</p> <p>2 Q. Were you there when he -- the first day you</p> <p>3 were there after the fire, was he there?</p> <p>4 A. Yes.</p> <p>5 Q. Did you suggest to him that he hire a fire</p> <p>6 expert to determine the cause and origin of the fire?</p> <p>7 A. No.</p> <p>8 Q. So let me ask you again. Explain to us how</p> <p>9 the fire actually started.</p> <p>10 A. The wire -- the fire started in that triplex.</p> <p>11 It was on the wire. The insulation was coming off</p> <p>12 with -- appears to me, and they all bonded together.</p> <p>13 And you had 240 volts going into each 120-volt line. It</p> <p>14 melted that meter out of there, because those are</p> <p>15 plug-in heaters, but the neutral wire had 240 volts</p> <p>16 going through it. That's a solid bar that goes through</p> <p>17 that and it goes into that panel box. That ignited</p> <p>18 everything inside that panel box and burned everything.</p> <p>19 It was sending electric through all those conductors,</p> <p>20 ran circuits going throughout his house.</p> <p>21 Q. Okay. So did you determine that the fire</p> <p>22 started in the breaker panel?</p> <p>23 A. No, it started out in the yard.</p> <p>24 Q. Okay. It didn't start inside the house.</p> <p>25 A. Correct.</p>

<p style="text-align: right;">Page 157</p> <p>1 Q. It started in -- in -- in -- in the -- in the</p> <p>2 yard. Is that what you're telling us?</p> <p>3 A. Yeah.</p> <p>4 Q. Okay. And that -- and you said that's because</p> <p>5 the triplex wires arc between themselves, correct?</p> <p>6 A. Correct.</p> <p>7 Q. Which means the insulation on the wires had to</p> <p>8 have been broken down and allow the wires to arc, right?</p> <p>9 A. Right.</p> <p>10 MR. SCHAUER: Okay. So if you'll scroll</p> <p>11 down again now, Jonathan, please. Okay, right there.</p> <p>12 Good. Okay.</p> <p>13 Q. (BY MR. SCHAUER) Okay. So you say in the</p> <p>14 first paragraph here that the arcing started about 20</p> <p>15 feet from the connection, I guess to the weatherhead; is</p> <p>16 that correct?</p> <p>17 A. That's correct.</p> <p>18 Q. And how did you determine that?</p> <p>19 A. Just where the triplex come down at -- what</p> <p>20 was left of it.</p> <p>21 Q. Okay. And -- and then -- again, this is where</p> <p>22 you talk about it was replaced two months before the</p> <p>23 fire and it was stretched and while replacing the</p> <p>24 existing wires from the old pole to the new pole it --</p> <p>25 it stretched and I guess cracked the wires?</p>	<p style="text-align: right;">Page 159</p> <p>1 also when you're talking about the stretching of the --</p> <p>2 of the triplex, that it was plain to see from the</p> <p>3 photographs Mr. Cude showed me.</p> <p>4 Now, is one of those photographs the one</p> <p>5 we looked at a little while ago where the guys are up</p> <p>6 there installing a new pole?</p> <p>7 A. Correct.</p> <p>8 Q. And -- and the way -- and so you're telling me</p> <p>9 from that -- from that shot you can see the wires --</p> <p>10 excuse me, the insulation cracked on that triplex?</p> <p>11 A. I can't see that, no, I can't.</p> <p>12 Q. Okay. So from those photographs, what gives</p> <p>13 you the impression that they were stretched to the point</p> <p>14 that they had actually cracked or fallen off the</p> <p>15 insulation?</p> <p>16 A. They was stressed too tight. That distance</p> <p>17 should have at least a two-inch -- or two-foot loop in</p> <p>18 that thing where it was drooping down, going in not a</p> <p>19 straight shot because of the wind in this area.</p> <p>20 Q. Are you talking about a sag?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. But I want to make sure we understand.</p> <p>23 The only reason you think that this triplex was cracked</p> <p>24 and the insulation might have been falling off was</p> <p>25 because in those photos you see it -- you see it</p>
<p style="text-align: right;">Page 158</p> <p>1 A. That wire has been there since I don't know</p> <p>2 when. According to the transformer, the transformer was</p> <p>3 built in 1964. And I don't know how long that triplex</p> <p>4 has been there. I have no data on that.</p> <p>5 Q. Well, do you know when the transformer was set</p> <p>6 on that pole?</p> <p>7 A. I have no idea. I didn't live here at that</p> <p>8 time.</p> <p>9 Q. Okay. What makes you think they didn't</p> <p>10 replace the triplex at the time they replaced the pole?</p> <p>11 A. Walt Cude was here when they replaced it, the</p> <p>12 pole, but they did not replace the triplex.</p> <p>13 Q. Have you seen -- I'm sorry, go ahead.</p> <p>14 A. He was watching them when they was doing it.</p> <p>15 Q. Have you seen the -- the records that have</p> <p>16 been produced by AEP concerning the replacement of the</p> <p>17 pole?</p> <p>18 A. No.</p> <p>19 Q. If they had a bill of material that listed the</p> <p>20 triplex in there, would you agree -- would you agree</p> <p>21 with me that they replaced the triplex then?</p> <p>22 A. I would agree with you, but I haven't seen</p> <p>23 anything.</p> <p>24 Q. That's fair enough. I understand.</p> <p>25 Now, you -- you told us in this report</p>	<p style="text-align: right;">Page 160</p> <p>1 stretched pretty tight, correct?</p> <p>2 A. Correct.</p> <p>3 Q. That wasn't a problem until two months later</p> <p>4 and I think you mean the night of the fire, correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And you say that because the night of</p> <p>7 the fire there were gale force winds beginning to blow,</p> <p>8 correct?</p> <p>9 A. I wasn't up at that hour.</p> <p>10 Q. Well, I guess my question is how do you know</p> <p>11 gale force winds were blowing?</p> <p>12 A. I have no idea about that. I wasn't up at</p> <p>13 that time of day. I never said there was gale force</p> <p>14 winds up there.</p> <p>15 Q. Well, let's look at this paragraph here, the</p> <p>16 second paragraph on the screen. It says, The moment two</p> <p>17 months later when gale force winds began blowing the</p> <p>18 wires around, the faults in the wire/insulation suddenly</p> <p>19 affected themselves and began to arc and spark.</p> <p>20 Now that's in your -- that's in your</p> <p>21 report that you signed. Are you telling me today you</p> <p>22 have no idea of any -- how strong the winds were that</p> <p>23 night?</p> <p>24 A. I don't know how strong those winds are at</p> <p>25 night.</p>

Page 161

1 Q. Okay. And you told us that Mr. Cude wrote
2 this for you to sign, correct?

3 **A. Yes.**

4 Q. Did you read this before you signed it?

5 **A. I pretty much went through everything.**

6 Q. Well, did you tell him that's not true, I
7 don't know anything about gale force winds?

8 **A. I don't know about the gale force winds part.**
9 **I just skimmed through it all.**

10 Q. Okay. All right.

11 **A. He's speaking of the gale force winds when**
12 **hurricane Harvey came through.**

13 Q. Well, that was two months prior, correct?

14 **A. I don't know specifically what date that was.**

15 Q. Okay. So let me make sure I understand. So
16 the -- so the -- the winds didn't have anything to do
17 with your theory that the arcing occurred in the
18 triplex; is that correct?

19 **A. That's correct.**

20 Q. Now, this fire started about 4 a.m. in the
21 morning, correct?

22 **A. That's what I was told.**

23 Q. Okay. Do you know what the wind speed was at
24 4 o'clock in the morning that day?

25 **A. I don't know.**

Page 162

1 Q. Okay.

2 **A. I don't get up at that time of day.**

3 Q. Okay. And then you say here that the arcing
4 caused the electricity to go to the nearest ground, and
5 you said that was Cude's ground rod; is that correct?

6 **A. That is correct.**

7 Q. Okay. What kind of amperage are we talking
8 about that was now flowing?

9 **A. You've got approximately 240 volts going to**
10 **ground, and it's going to that main which is -- I'm**
11 **pretty much sure that tripped that main breaker, but the**
12 **transformer was not -- that was a constant power going**
13 **to that. That transformer did not trip. He had a**
14 **constant power going into that meter and that panel box**
15 **and that's what caused that fire.**

16 Q. Well, you didn't answer my question. What
17 kind of amperage, not voltage, amperage are we talking
18 about and that arcing being -- causing?

19 **A. I don't think he was using that much amperage**
20 **at that time of night.**

21 Q. Well, let me ask you, did you calculate what
22 amperage it would have taken?

23 **A. There wasn't no amperage really involved. And**
24 **I think the only thing he had going on at the time was a**
25 **heater.**

Page 163

1 Q. Well, let me ask you, did this arc on the
2 triplex occur between an energized phase in the
3 neutral --

4 **A. Yes.**

5 Q. -- or between two -- or between two energized
6 phases?

7 **A. All three of them.**

8 Q. Simultaneously or one -- did one happen
9 first?

10 **A. One probably started first and it got the**
11 **other one ignited. They was all bonded together.**

12 Q. Okay. So if you know the impedance, you know
13 the voltage, you can calculate the amperage, correct?

14 **A. Correct.**

15 Q. Did you try to do that?

16 **A. No.**

17 Q. Okay. So you have no idea what current was
18 flowing to the ground and through that breaker panel,
19 correct?

20 **A. Correct.**

21 Q. So let me ask you this. If the electricity
22 went into Cude's house through the meter and through the
23 breaker panel that you installed, why didn't the surge
24 protector do its job and save the house?

25 **A. It all burned up. You had 240 volts going**

Page 164

1 **into that house. Amperage didn't have a -- anything to**
2 **do with this. It was the voltage.**

3 Q. I'm going to ask it again. Why didn't the
4 surge protector do its job?

5 **A. It was on fire from 240 volts coming from the**
6 **triplex and AEPs feeding into that panel box, and it**
7 **burned -- melted everything in that box.**

8 Q. Well, did you install the surge protector
9 correctly?

10 **A. Yes.**

11 Q. Could it have malfunctioned?

12 **A. No.**

13 Q. Did you look at it after the fire?

14 **A. There was nothing left of anything.**

15 Q. Okay. Well, you told us earlier that this was
16 a surge in electricity that went into his house,
17 correct?

18 **A. Correct.**

19 Q. And we looked at all the information on the
20 surge protector, and it said it's there to protect the
21 house from that.

22 **A. That's on two phases that plugs in -- two**
23 **phases that's on like a too full 50-amp breaker. It's**
24 **on two phases of that, in that panel box. But you've**
25 **got that voltage going through that -- from that meter**

<p style="text-align: right;">Page 165</p> <p>1 going into that panel box. Everything is on fire. Then</p> <p>2 it seeped through the 110 circuits that was plugged into</p> <p>3 that circuit box. And it just melted everything.</p> <p>4 Q. Well, let's -- let's do this. We can agree on</p> <p>5 this: The surge protector did nothing to protect the</p> <p>6 house, correct?</p> <p>7 A. Apparently not.</p> <p>8 Q. Okay. Now, can you tell me what methodology</p> <p>9 you have used to determine the cause of this fire?</p> <p>10 A. I've already said it started on the triplex.</p> <p>11 Q. No. I understand you gave us your</p> <p>12 explanation. But can you describe what you went through</p> <p>13 to get there?</p> <p>14 A. I seen what was left of the triplex that was</p> <p>15 melted down at Walt's house that burned down, and I seen</p> <p>16 what happened to Walt's truck in the driveway. That was</p> <p>17 melted triplex.</p> <p>18 Q. Are you familiar with NFPA 921?</p> <p>19 A. I haven't looked at it recently, no.</p> <p>20 Q. Do you know what it is?</p> <p>21 A. You tell me.</p> <p>22 Q. No, I want -- I want to know if you know what</p> <p>23 it is. If you don't, just tell me you don't know what</p> <p>24 it is.</p> <p>25 A. I know what NEC is.</p>	<p style="text-align: right;">Page 167</p> <p>1 transformer, it's got a fuse inside the transformer in a</p> <p>2 breaker, and it did not have a cutout fuse on that</p> <p>3 transformer.</p> <p>4 Q. Well, we're going to talk about that in a</p> <p>5 minute, but do you know what a CSP transformer is?</p> <p>6 A. They got different types of transformers.</p> <p>7 Q. No, I'm asking a specific, a CSP, do you know</p> <p>8 what that stands for?</p> <p>9 A. No, I don't.</p> <p>10 Q. Okay. It stands for completely</p> <p>11 self-protected.</p> <p>12 A. All right.</p> <p>13 Q. Have you ever had to deal with a CSP</p> <p>14 transformer before?</p> <p>15 A. Yes, I have.</p> <p>16 Q. Where?</p> <p>17 A. It was in an establishment. It was an</p> <p>18 industrial establishment. I think it was in Houston.</p> <p>19 Q. Okay. So you're -- you're talking about some</p> <p>20 -- some customer had a CSP transformer?</p> <p>21 A. Yes.</p> <p>22 Q. Okay. So now you know what a CSP transformer</p> <p>23 is; is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. First of all let me ask, you've never</p>
<p style="text-align: right;">Page 166</p> <p>1 Q. No, sir, I'm talking about NFPA 921.</p> <p>2 A. No.</p> <p>3 Q. Okay. How did you eliminate other causes of</p> <p>4 the fire?</p> <p>5 A. Because it was still energized when it come</p> <p>6 down on Walt's truck, and that transformer did not trip.</p> <p>7 Q. Well, my question, though, is, what did you do</p> <p>8 to eliminate other causes, or did you just decide when</p> <p>9 you saw the evidence, that's how it happened?</p> <p>10 A. When I looked at the evidence, when I seen</p> <p>11 aftereffects, that's when I decided that was the triplex</p> <p>12 that caused that. If that transformer would have</p> <p>13 tripped, there would have been no -- that triplex</p> <p>14 wouldn't have no -- wouldn't have been energized and it</p> <p>15 would not have burned his truck down.</p> <p>16 Q. So observing that morning the fire scene, you</p> <p>17 decided that that is what caused the fire --</p> <p>18 A. That's what I --</p> <p>19 Q. -- without really going and eliminating</p> <p>20 anything else; is that correct?</p> <p>21 A. That's correct.</p> <p>22 Q. Okay. Now, you say in your report that the</p> <p>23 transformer didn't have a fuse, but you know that's</p> <p>24 wrong, correct?</p> <p>25 A. According to the nameplate on that</p>	<p style="text-align: right;">Page 168</p> <p>1 worked for an electric utility, have you?</p> <p>2 A. No.</p> <p>3 Q. Okay. Have you ever installed a CSP</p> <p>4 transformer?</p> <p>5 A. I've installed them for customers but that was</p> <p>6 bars and grills.</p> <p>7 Q. Well, you installed them for a customer on a</p> <p>8 private piece of property, correct?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. So CSP transformer has an internal</p> <p>11 fuse, correct?</p> <p>12 A. It's got an internal fuse on the line side and</p> <p>13 it's got a breaker on the secondary side.</p> <p>14 Q. Right. It's also got a lightning arrestor</p> <p>15 mounted externally on the tank on the high side,</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. Where is the closest line fuse feeding that</p> <p>19 transformer? Since you and Mr. Cude have driven the</p> <p>20 lines, where is it?</p> <p>21 A. I can't find one.</p> <p>22 Q. Okay. Let me ask you, how far is South Vista</p> <p>23 Drive and Buffalo Trail from that location?</p> <p>24 A. It's probably about three-quarters of a</p> <p>25 mile.</p>

Page 169

1 Q. Okay. And are you telling us you didn't see a
2 line fuse down there?

3 **A. That's what I'm telling you.**

4 Q. Okay. So it's either there or it's not.
5 That's pretty easy to find. But, okay, if it's there,
6 then it would have been protected by a cutout, correct?

7 **A. Yes, it should have a line or printout on that
8 transformer itself.**

9 Q. No, sir, that's on a regular transformer, not
10 on a CSP transformer. Or do you know that?

11 **A. A CPS, what you're saying, that should have
12 protected that transformer.**

13 Q. But a CSP has its own internal cutout, doesn't
14 it?

15 **A. That's correct. At this point, apparently did
16 not work.**

17 Q. Well, we'll get to that in a minute. But you
18 said that it wasn't protected by a fuse, but it was, not
19 only inside the tank but also down at three-quarters
20 mile a way that was a fuse cutout, wasn't there?

21 **A. I did not see one at the time.**

22 Q. Okay. All right. You also say that the
23 transformer wasn't grounded, but you know that's wrong,
24 correct?

25 **A. I know the transformer was grounded, but it**

Page 170

1 was grounded incorrectly.

2 Q. Okay. First of all, it's grounded to the
3 system neutral, correct?

4 **A. Yes.**

5 Q. Are you saying that's -- that's incorrect?

6 **A. That wire, that ground wire was wrong size
7 ground wire. And that ground wire that they had on that
8 was all corroded up; it wasn't making a good ground.**

9 Q. Well, let's -- let's -- let's back up. You're
10 talking about the ground wire that goes down the pole,
11 correct?

12 **A. Ground wire going down the pole, correct.**

13 Q. What I said was, the transformer is connected
14 to the system neutral at the top of the pole, correct?

15 **A. It's bonded together, yes.**

16 Q. Right. And it's actually -- goes in and
17 attaches to the system neutral.

18 **A. Yes.**

19 Q. And that's through the secondary neutral
20 ground strap, correct?

21 **A. Yes.**

22 Q. Okay. And then the transformer case is also
23 attached to the ground wire you're talking about that
24 runs down to the bottom of the pole, correct?

25 **A. Correct.**

Page 171

1 Q. Okay. So you're telling us, first of all,
2 that the wire that -- that ground wire is the wrong
3 size?

4 **A. It's the wrong size.**

5 Q. All right. How can you -- how can you prove
6 to us it's the wrong size?

7 **A. There's two wires. This is a number 8 wire.
8 This is a number 4 wire. AEP requires all the service
9 to be done with a number 4 gauge wire. See the
10 difference in sizes?**

11 Q. Well, let me ask you a question. Is that
12 stranded wire or hard-drawn copper?

13 **A. It's stranded.**

14 Q. Stranded, correct?

15 **A. That's correct.**

16 Q. Okay. Where do you get that AEP requires it's
17 got to be a number 4 wire?

18 **A. It says that in there, what they require.**

19 Q. Are you talking about the meter installation
20 manual?

21 **A. That's correct.**

22 Q. The meter installation manual applies to the
23 customer's ground, right?

24 **A. Right, and also --**

25 Q. Up to -- up to the utility ground, right?

Page 172

**1 A. If you look at the NEC grounding, it will also
2 say a number 4.**

3 Q. You know what, let's go to the NEC right now.
4 Have you got your NEC with you?

5 **A. I think I do.**

6 Q. You have the whole thing?

7 **A. I think I do.**

8 Q. All right. I want you to go to the
9 introduction which is Article 90. Tell me when you get
10 there.

11 **A. I am here at Article 90.**

12 Q. You see 90.-2 which says scope?

13 **A. Yes.**

14 Q. Do you see A says covered?

15 **A. Yes.**

16 Q. And B says not covered. Do you see that?

17 **A. Yes.**

18 Q. And B says this code does not cover -- go over
19 to number 5 and read that for us.

20 **A. Mandatory rules, permissive rules, and
21 (unintelligible) material.**

22 Q. You're on -- you're on --

23 **A. That's 90.5.**

24 Q. No, no, no, 90-2B5. You're still in number B
25 which is this code does not cover.

<p style="text-align: right;">Page 173</p> <p>1 A. Installations under this exclusive control of</p> <p>2 an electrical utility for such installations.</p> <p>3 Q. That's right. It says right here in the first</p> <p>4 part of the NEC, this code does not cover installations</p> <p>5 under the exclusive control of electric utilities.</p> <p>6 That's what it says, doesn't it?</p> <p>7 A. That's what it says.</p> <p>8 Q. The NEC has absolutely nothing to do with AEP</p> <p>9 and its equipment, does it?</p> <p>10 A. It's supposed to go by the NEC. There's --</p> <p>11 should be going by their requirements.</p> <p>12 Q. No. This thing says it doesn't cover the</p> <p>13 utilities installation, doesn't it?</p> <p>14 A. It also says in here it's got the authority of</p> <p>15 the jurisdiction.</p> <p>16 Q. No, sir. The NEC, the book itself says it is</p> <p>17 not -- does not cover the utilities installation.</p> <p>18 A. That's incorrect.</p> <p>19 Q. Well, I thought you just read it for us.</p> <p>20 A. I just read that, but it's still not correct</p> <p>21 the way it's been installed.</p> <p>22 Q. Well, it's not installed according to the NEC,</p> <p>23 is it?</p> <p>24 A. Nope.</p> <p>25 Q. Okay. So how do you know it's incorrect,</p>	<p style="text-align: right;">Page 175</p> <p>1 Q. (BY MR. SCHAUER) Okay. Mr. Winkfein, we took</p> <p>2 a break, and one of the things you talked about at</p> <p>3 length is your opinion that the transformer</p> <p>4 malfunctioned because you've seen these -- the</p> <p>5 parking -- it looks like evidence of parking on the</p> <p>6 triplex, correct?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. Well, let me ask you a question. Let's</p> <p>9 say some guy had decided to have a party out there and</p> <p>10 he built him a big fire underneath that triplex, and he</p> <p>11 lit that sucker and the flames started licking the</p> <p>12 triplex. What's going to happen?</p> <p>13 A. It's going to burn that triplex.</p> <p>14 Q. Well, it's going to burn through the</p> <p>15 insulation first, right?</p> <p>16 A. Right.</p> <p>17 Q. And then the insulation, once it's gone, those</p> <p>18 conductors are going to start arcing, correct?</p> <p>19 A. Correct.</p> <p>20 Q. And you're going to have arcing like you</p> <p>21 described until that thing finally melts in two and</p> <p>22 separates, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. If -- if something like that would</p> <p>25 happen, in that case the damaged triplex would have been</p>
<p style="text-align: right;">Page 174</p> <p>1 then, if it doesn't even have to comply with the NEC?</p> <p>2 A. It was properly installed. This is by what</p> <p>3 I've seen and what I've -- basically what I've seen.</p> <p>4 Q. But you're saying that because you're</p> <p>5 comparing that with the requirements of the NEC,</p> <p>6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. And we know now that the NEC itself says it</p> <p>9 doesn't cover electrical utility installations.</p> <p>10 A. Well, that's what it's saying there in Article</p> <p>11 90.</p> <p>12 Q. Okay.</p> <p>13 MR. SWALLOW: Hey, Don, why don't we take</p> <p>14 a quick break?</p> <p>15 MR. SCHAUER: Well, let me -- let me just</p> <p>16 finish this part. Okay?</p> <p>17 MR. SWALLOW: All right. Bill, are you</p> <p>18 feeling all right?</p> <p>19 THE WITNESS: I'm ready for a break.</p> <p>20 MR. SCHAUER: Okay, let's take a break.</p> <p>21 THE VIDEOGRAPHER: The time 2:55 p.m. We</p> <p>22 are off the record.</p> <p>23 (Break from 2:55 to 3:13 p.m.)</p> <p>24 THE VIDEOGRAPHER: The time is 3:13 p.m.</p> <p>25 We are now on the record.</p>	<p style="text-align: right;">Page 176</p> <p>1 a result of the fire, not the cause of the fire,</p> <p>2 correct?</p> <p>3 A. Well --</p> <p>4 Q. Well, how would it be the cause if the fire</p> <p>5 underneath if melted it?</p> <p>6 A. If -- well, first place, there wasn't no fire</p> <p>7 underneath of it.</p> <p>8 Q. No, I told you to assume that for me. I</p> <p>9 didn't -- I didn't -- I'm not arguing with you. I'm</p> <p>10 just saying assume that. What would happen if that --</p> <p>11 if that occurred? And I think you told me the fire</p> <p>12 would melt the triplex insulation and you would have a</p> <p>13 bunch of arcing, right?</p> <p>14 A. That's correct.</p> <p>15 Q. Okay. Now, I asked you earlier what magnitude</p> <p>16 of amperage would it have taken to start this fire, and</p> <p>17 you told me you didn't know and you didn't try to</p> <p>18 calculate it. Correct?</p> <p>19 A. Correct.</p> <p>20 Q. So if that's true, how do you know that the</p> <p>21 amperage got high enough to open the fuses in the</p> <p>22 transformer or on the lines?</p> <p>23 A. Because the voltage.</p> <p>24 Q. Okay. Let's talk about that. What causes a</p> <p>25 breaker to open, voltage or amperage?</p>

<p style="text-align: right;">Page 177</p> <p>1 A. Both.</p> <p>2 Q. Voltage you said?</p> <p>3 A. Voltage and amperage.</p> <p>4 Q. Well, the amperage, the flow of the amperage</p> <p>5 is what causes a breaker to trip, correct?</p> <p>6 A. That's normally, unless it's got a fault.</p> <p>7 Q. Well, what's -- what's written on a breaker?</p> <p>8 Just take a regular breaker in everybody's house.</p> <p>9 What's it say?</p> <p>10 A. It says it -- like on single pole, 20-amp</p> <p>11 breakers.</p> <p>12 Q. 20 amps, that -- that's current, right, that's</p> <p>13 amperage?</p> <p>14 A. That's amperage.</p> <p>15 Q. And so what happens is, if the amperage gets</p> <p>16 higher than 20 or the current gets higher than 20 amps,</p> <p>17 that thing is supposed to open up and kill the power,</p> <p>18 right?</p> <p>19 A. That's correct, unless you have a ground</p> <p>20 fault.</p> <p>21 Q. Well, the same thing with a fuse, an external</p> <p>22 fuse. What makes a fuse blow is excess amperage,</p> <p>23 correct?</p> <p>24 A. Amperage and ground fault.</p> <p>25 Q. Well, the voltage has nothing to do with it.</p>	<p style="text-align: right;">Page 179</p> <p>1 Q. But you told me you don't know how much</p> <p>2 current was flowing, right?</p> <p>3 A. No, I don't.</p> <p>4 Q. And so the breakers and the fuses are all</p> <p>5 rated to open at a certain current, correct?</p> <p>6 A. At a certain current or you have a ground</p> <p>7 fault.</p> <p>8 Q. Well, a ground fault is what causes the</p> <p>9 current to flow, right?</p> <p>10 A. Unless you have a ground going across a hot</p> <p>11 wire, it will open up that ground wire regardless if you</p> <p>12 got amperage going through it or not.</p> <p>13 Q. Well, no. If you have a -- if you have a wire</p> <p>14 touching a neutral, that's a direct fault, isn't it?</p> <p>15 A. That is correct.</p> <p>16 Q. And that's going to cause a lot of current to</p> <p>17 flow, correct?</p> <p>18 A. That's what's going to happen is they're going</p> <p>19 to have a hot wire and a ground touching together, and</p> <p>20 that's going to make a ground fault and it will open it</p> <p>21 up.</p> <p>22 Q. That's right, because there's a lot of current</p> <p>23 flowing through a direct fault?</p> <p>24 A. It doesn't need any current. It just has to</p> <p>25 touch together.</p>
<p style="text-align: right;">Page 178</p> <p>1 You could have 100,000 volts across it, but if there's</p> <p>2 no amps going through the fuse, it's never going to open</p> <p>3 up, is it?</p> <p>4 A. It will open up, have a ground fault.</p> <p>5 Q. Well, if there's a ground fault, that means</p> <p>6 there's going to be amperage and current going through</p> <p>7 the fuse, correct?</p> <p>8 A. You'll have some and it doesn't take much.</p> <p>9 Q. Well, that's what it takes to open the fuse</p> <p>10 and the breaker is the amperage, correct?</p> <p>11 A. It will open up that except for ground fault,</p> <p>12 will open -- close that -- open up that breaker.</p> <p>13 Q. Well, the ground fault causes the flow of</p> <p>14 current, correct?</p> <p>15 A. Correct.</p> <p>16 Q. And it's the current that opens up the breaker</p> <p>17 or the fuse, correct?</p> <p>18 A. That's correct.</p> <p>19 Q. Okay. How do you know there was enough</p> <p>20 current in the system to open up the fuse or the</p> <p>21 breaker?</p> <p>22 A. You had a bad ground fault.</p> <p>23 Q. But you don't --</p> <p>24 A. Those conductors at the time was connected to</p> <p>25 that service at the time.</p>	<p style="text-align: right;">Page 180</p> <p>1 Q. Okay. Let me make sure I understand for our</p> <p>2 other experts. You're telling us that the current</p> <p>3 doesn't open up the breaker or the fuse, has nothing to</p> <p>4 do with that. Is that right?</p> <p>5 A. That's not what I'm saying. I'm saying the</p> <p>6 amperage will open up that breaker, that's correct. But</p> <p>7 if you have a ground fault where your hot wire is</p> <p>8 touching to a ground wire, that will also open up that</p> <p>9 breaker.</p> <p>10 Q. That's because the amperage that occurs --</p> <p>11 A. No, no, no.</p> <p>12 Q. Okay. Good enough. I just wanted to make</p> <p>13 sure you're going to tell us that it's not the current</p> <p>14 that opens up the breaker or the fuse.</p> <p>15 A. I'm not saying that. I'm saying the current</p> <p>16 and the voltage will do both of -- both of them will do</p> <p>17 the same thing.</p> <p>18 Q. And you're saying the voltage will do it</p> <p>19 whether there's current going through it or not.</p> <p>20 A. That's correct.</p> <p>21 Q. Okay. That's all I wanted to make sure you</p> <p>22 said. Okay.</p> <p>23 Now, we -- we talked about the evidence</p> <p>24 you have that the transformer malfunctioned, and I</p> <p>25 thought you said your evidence is the fact that the</p>

<p style="text-align: right;">Page 181</p> <p>1 house burned down; is that correct?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. Now, if there had been some malfunction</p> <p>4 in the transformer, wouldn't you have expected the same</p> <p>5 types of problems to occur to the neighbor's house?</p> <p>6 A. It was happening at the neighbor's house.</p> <p>7 Q. Okay. So the same thing would have happened</p> <p>8 to the neighbor's house that was happening to Mr. Cude's</p> <p>9 house, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Okay. How about all the other residences on</p> <p>12 that circuit? Would they have had to experience the</p> <p>13 same problem?</p> <p>14 A. On that particular instance, this is just</p> <p>15 going through the line side, and if it would have kept</p> <p>16 on going, the neighbors would have had the same problem.</p> <p>17 His one neighbor was fixing to have a problem, but AEP</p> <p>18 come out, pulled out the meter in his neighbor's house,</p> <p>19 and cut the wires on it. So that stopped, eliminated</p> <p>20 that problem.</p> <p>21 Q. Okay. Let's talk about that. How do you know</p> <p>22 that?</p> <p>23 A. That's just what I been -- was told. I wasn't</p> <p>24 there at the time.</p> <p>25 Q. Who told you that?</p>	<p style="text-align: right;">Page 183</p> <p>1 Q. Oh, it wasn't? You don't think the fire from</p> <p>2 Mr. Cude's house was blowing into that line?</p> <p>3 A. No.</p> <p>4 Q. Okay. Good enough.</p> <p>5 You just think it arced over by itself</p> <p>6 also, correct?</p> <p>7 A. It was going through that same line. They was</p> <p>8 both coming out of that transformer.</p> <p>9 Q. Okay. And then if the AEP guy wasn't even</p> <p>10 there, why didn't the neighbors house burn down?</p> <p>11 A. He was just taking a long time to get down to</p> <p>12 the neighbor's house, making a trail?</p> <p>13 Q. It was taking a long time. What's the speed</p> <p>14 of electricity? Do you know?</p> <p>15 A. I have no clue.</p> <p>16 Q. Do you know what the speed of light is?</p> <p>17 A. No.</p> <p>18 Q. Okay. But you're telling me if we waited long</p> <p>19 enough, it would have burned down the neighbor's house?</p> <p>20 A. It would have.</p> <p>21 Q. Okay. Let me -- let me talk about your</p> <p>22 background. Okay?</p> <p>23 A. All right.</p> <p>24 Q. You -- I think you told us that you had -- you</p> <p>25 had taken courses at the University of Tennessee; is</p>
<p style="text-align: right;">Page 182</p> <p>1 A. The fire department.</p> <p>2 Q. Who in the fire department?</p> <p>3 A. Ron Meyers.</p> <p>4 Q. So if we depose Ron Meyers, he's going to tell</p> <p>5 us that before they could even start fighting the fire,</p> <p>6 AEP was over there pulling the meter on the neighbor's</p> <p>7 house?</p> <p>8 A. They was out there at approximately the same</p> <p>9 time.</p> <p>10 Q. That's what you've been told?</p> <p>11 A. That's what I was told.</p> <p>12 Q. Have you looked at any of the evidence that's</p> <p>13 been provided in this case about when the AEP guy even</p> <p>14 got to the scene?</p> <p>15 A. I have no idea when they got to the scene.</p> <p>16 Q. Well, if he got to the scene two hours after</p> <p>17 the fire started, then he didn't pull the meter to save</p> <p>18 the neighbor's house, correct?</p> <p>19 A. What I seen out there, the pole in the</p> <p>20 neighbor's yard after it was burnt, and the neighbor,</p> <p>21 Mr. Day, said that neighbor's yard, triplex is arcing</p> <p>22 also.</p> <p>23 Q. You're right because it was in the path of the</p> <p>24 fire, wasn't it?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 184</p> <p>1 that correct?</p> <p>2 A. That is correct.</p> <p>3 Q. And I thought you told us you got a Master's</p> <p>4 license at the University of Tennessee?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Well, that's different than a Master's</p> <p>7 in electrical engineering, isn't it?</p> <p>8 A. That's a Master's in electrical engineering I</p> <p>9 did at University of Tennessee.</p> <p>10 Q. You're telling me you got a bachelor's and a</p> <p>11 Master's in electrical from the University of Tennessee</p> <p>12 in four years?</p> <p>13 A. I went to college approximately 10 years</p> <p>14 altogether.</p> <p>15 Q. Okay. So you have these degrees that are up</p> <p>16 on your wall and a diploma from the University of</p> <p>17 Tennessee?</p> <p>18 A. I've got them in a cardboard box somewhere.</p> <p>19 Q. Okay. So if you -- if I asked you to show me</p> <p>20 your degree in electrical engineering from the</p> <p>21 University of Tennessee, could you provide that with the</p> <p>22 deposition?</p> <p>23 A. Sure.</p> <p>24 Q. Okay. Well, I would request that, that you</p> <p>25 shows us the diplomas, okay?</p>

<p style="text-align: right;">Page 185</p> <p>1 A. Sure.</p> <p>2 Q. And we'll make those the next deposition</p> <p>3 exhibits.</p> <p>4 Okay. So let me ask you, did you ever</p> <p>5 work as a electrical engineer?</p> <p>6 A. I've done some of it for about, I would say,</p> <p>7 about three months. But the suit and tie routine wasn't</p> <p>8 my bag.</p> <p>9 Q. Oh, okay. Who did you work for?</p> <p>10 A. I can't recall. It's been too many years ago.</p> <p>11 Q. Have you ever been a registered professional</p> <p>12 engineer?</p> <p>13 A. No.</p> <p>14 Q. Okay. You ever worked as a firefighter?</p> <p>15 A. No.</p> <p>16 Q. You have any certification on fire</p> <p>17 investigations?</p> <p>18 A. No.</p> <p>19 Q. Have you ever worked for an electric utility?</p> <p>20 A. No.</p> <p>21 Q. Do you know what the point of delivery is on a</p> <p>22 residential service?</p> <p>23 A. Point of delivery, what do you mean?</p> <p>24 Q. Well, there's a definition specifically in the</p> <p>25 utility industry about what the point of service is on a</p>	<p style="text-align: right;">Page 187</p> <p>1 whole book memorized. I don't study it that often</p> <p>2 anymore.</p> <p>3 Q. But you must have forgotten about Section 90,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. Do you consider yourself an expert in</p> <p>7 the NESC, which is the National Electrical Safety Code?</p> <p>8 A. Yes.</p> <p>9 Q. You do?</p> <p>10 A. I do --</p> <p>11 Q. Huh?</p> <p>12 A. National Electric Code tells you all the</p> <p>13 requirements throughout the nation, but each</p> <p>14 jurisdiction has got their own little things that they</p> <p>15 want to add to it and don't add to it.</p> <p>16 Q. Did you -- did you understand my question?</p> <p>17 The National Electrical Safety Code, not the National</p> <p>18 Electronic Code.</p> <p>19 A. Oh, the safety code. No, I haven't went</p> <p>20 through that.</p> <p>21 Q. So you don't consider yourself an expert in</p> <p>22 that, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. Do you know the difference between the</p> <p>25 NEC and NESC?</p>
<p style="text-align: right;">Page 186</p> <p>1 residence. I just wondered if you know what it is.</p> <p>2 A. Well, the point of delivery is out there</p> <p>3 coming from the transformer to the weatherhead on the</p> <p>4 structure.</p> <p>5 Q. Well, as it turns out it's the weatherhead.</p> <p>6 Did you know that, at the connection to the weatherhead?</p> <p>7 A. I just said that.</p> <p>8 Q. Okay. Well, you said something about the</p> <p>9 transformer. Transformer --</p> <p>10 A. That's where the power is originating from,</p> <p>11 and then it goes to the weatherhead. And that goes back</p> <p>12 into the meter and goes to the residence.</p> <p>13 Q. Right. But did you know the point of</p> <p>14 delivery --</p> <p>15 A. Yes.</p> <p>16 Q. -- was the weatherhead?</p> <p>17 A. Yes.</p> <p>18 Q. Okay, you knew that. Okay.</p> <p>19 Everything past that is the customer's,</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Do you consider yourself an expert in</p> <p>23 the NEC?</p> <p>24 A. Pretty much I used to be. I don't go through</p> <p>25 that book as much as I used to. I used to have that</p>	<p style="text-align: right;">Page 188</p> <p>1 A. Well, you got the -- the only part on the</p> <p>2 National Electric Code, you got the fire code inside of</p> <p>3 that also. They're the ones that designed that</p> <p>4 particular book.</p> <p>5 Q. Yeah, but I'm asking you if you know the</p> <p>6 difference between the NEC and the NESC.</p> <p>7 A. No.</p> <p>8 Q. Okay. I think you told -- told us earlier,</p> <p>9 this was the first time you've ever been deposed,</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Okay. Have you ever testified as an expert in</p> <p>13 a case before?</p> <p>14 A. No.</p> <p>15 Q. Okay. Now, I think you told us that you were</p> <p>16 testifying today for free; is that correct?</p> <p>17 A. Tested for what?</p> <p>18 Q. That you're testifying for free; you're not</p> <p>19 charging.</p> <p>20 A. Correct.</p> <p>21 Q. Have you been promised anything in this case</p> <p>22 if there's any money exchanged hands?</p> <p>23 A. No.</p> <p>24 Q. Okay. Now, when you were telling us how the</p> <p>25 ground -- the ground wire at the pole was wrong, is that</p>

<p style="text-align: right;">Page 189</p> <p>1 based on the requirements of the National Electric 2 Code? 3 A. Yes. 4 Q. Okay. We've already discussed that, about 5 what the code says about the utility installations, 6 correct? 7 A. Correct. 8 Q. Okay. Now, Mr. Swallow went through a bunch 9 of photographs with you, that you drove around with 10 Mr. Cude and took photos in the Arrowhead subdivision, 11 correct? 12 A. Correct. 13 Q. Are there any other utilities that serve the 14 Arrowhead subdivision? 15 A. No, it's all AEP. 16 Q. You don't think San Patricio Electric Co-op 17 has any lines and equipment out there? 18 A. Not in Arrowhead. They go into Lagardo, and 19 then they've got San Pavalec (ph.). 20 Q. Okay. Does NEC have anything out there? 21 A. Not that I'm aware of. 22 Q. Okay. So there were -- there were photographs 23 of transformers that were rusted, things of that nature. 24 We went through a bunch of that kind of stuff. My 25 question to you is, does that have anything to do with</p>	<p style="text-align: right;">Page 191</p> <p>1 Q. I'm sorry, I'm going through all the notes 2 here to try to get finished. 3 Now, you were asked a question and I 4 don't remember what -- I don't remember what exhibit it 5 was but it was this. It was the -- the meter -- the 6 meter manual. Do you remember that? 7 A. Yeah. 8 Q. Okay. And I think you said that the meter 9 manual was for AEP people; is that correct? 10 A. That's correct. 11 Q. Okay. Well, let me read from you from page 5 12 in the introduction. This informational booklet is 13 issued by American Electric Power Company for the 14 guidance of customers, engineers, architects, 15 contractors and other interested parties planning 16 electrical installations for residential buildings and 17 small commercial establishments. Did you know that? 18 A. That's part of the law. 19 Q. That says that this booklet, this meter guide 20 is for the public and people like you, correct? 21 A. That would be correct, but AEP has got to 22 follow the same rules. 23 Q. No, sir, this has to do with the meter 24 installations on the customer's equipment, right? 25 A. That's correct. And if I don't install it</p>
<p style="text-align: right;">Page 190</p> <p>1 the starting of this fire? 2 A. Well, all that's telling you -- telling me, 3 that AEP does not maintain their equipment. 4 Q. I understand what your argument is, but my 5 question is, did that have anything, those photographs 6 have anything to do with the actual cause of this fire? 7 A. No. 8 Q. You know, we did -- we got -- we saw the 9 transformer plate. Do you remember that? 10 A. Yes. 11 Q. Okay. What do you think the transformer plate 12 was telling us? 13 A. It was telling you that internally that had a 14 fuse on the line side and had a secondary breaker on the 15 secondary side. 16 Q. And it tells you what the settings are, 17 doesn't it? 18 A. Yes. 19 Q. Okay. Do you have any way to determine 20 whether or not those settings are correct in that 21 transformer? 22 A. I'd have to look at it again. 23 Q. I guess my question is, you don't have any 24 evidence that the settings are incorrect, correct? 25 A. Correct.</p>	<p style="text-align: right;">Page 192</p> <p>1 correctly, then AEP will not energize that building. 2 Q. But AEP doesn't inspect it, do they? They 3 wait for you -- 4 A. They do -- out here they do. 5 Q. What? 6 A. They do here. 7 Q. Oh, tell me who's done it for you. 8 A. The people that's been coming out installing 9 meters for hooking up new service, they inspect if it's 10 got the service is grounded or not grounded and properly 11 or what. 12 Q. They don't -- but you told me -- 13 A. That's what they inspect. That's the only 14 thing they inspect. 15 Q. Well, they inspect the meters enclosure, 16 correct? 17 A. Correct. 18 Q. Because they're going to put their meter in. 19 A. Correct. 20 Q. But they don't inspect the customer's 21 equipment and wiring, do they? 22 A. No, just the wire going into that meter. 23 Q. Okay. You know what, I think that's all I 24 have at the moment unless Mr. Swallow asks you something 25 that I want to follow up on. I appreciate your time.</p>

<p style="text-align: right;">Page 193</p> <p>1 A. Yes, sir.</p> <p>2 EXAMINATION</p> <p>3 BY MR. SWALLOW:</p> <p>4 Q. I've got a few. Are you all right to go for a</p> <p>5 little bit longer, Mr. Winkfein?</p> <p>6 A. I'll try it a little bit longer.</p> <p>7 Q. Okay. I don't think I'll take very long.</p> <p>8 Mr. Schauer talked a little bit about 240</p> <p>9 volts being the maximum that can go into -- to the</p> <p>10 residence from the AEP service in -- in this case. Do</p> <p>11 you remember that?</p> <p>12 A. Yes.</p> <p>13 Q. Is that -- what do people normally weld with?</p> <p>14 Is that normally 240 volts?</p> <p>15 A. It's usually 240 volts.</p> <p>16 Q. And I'm trying to come up here -- come up with</p> <p>17 an example that -- that -- illustrative to the jury.</p> <p>18 You know, and a welder creates an incredible amount of</p> <p>19 heat, right? Is that the --</p> <p>20 A. Like this.</p> <p>21 Q. Did you ever do any welding?</p> <p>22 A. I'm not a welder.</p> <p>23 Q. Okay. All right. 240 volts, though, is --</p> <p>24 would you agree is sufficient to create enough heat to</p> <p>25 start a fire?</p>	<p style="text-align: right;">Page 195</p> <p>1 fire started and then slowly sizzled somewhere, but this</p> <p>2 -- the fire almost started everywhere at once?</p> <p>3 A. Pretty much.</p> <p>4 Q. Okay. Now, Mr. Schauer was asking whether you</p> <p>5 had any ideas about the winds that night. And I did ask</p> <p>6 you ask a question about that, and I think my question</p> <p>7 was not whether -- whether it was blowing that night,</p> <p>8 but is that -- if it were blowing that night, is that</p> <p>9 something that could have contributed to the -- the</p> <p>10 wires arcing coming into contact with each other?</p> <p>11 A. It could have had, depending if those wires</p> <p>12 was damaged. They could -- the wind swinging those</p> <p>13 conductors, that could have entered -- that's what could</p> <p>14 have started off the arcing right there.</p> <p>15 Q. And the same question -- all right -- I had</p> <p>16 asked you a similar question. With the moisture or</p> <p>17 rain, is that something else that can --</p> <p>18 A. That's conductive.</p> <p>19 Q. Would contribute to -- if it were. And I</p> <p>20 understand you weren't -- you weren't up at 4 a.m. when</p> <p>21 the fire started. But if those were the conditions that</p> <p>22 night, could that have contributed to it?</p> <p>23 A. Sure. Dew can cause that too on the lines.</p> <p>24 Q. Okay. Now, I actually asked you during --</p> <p>25 during my questioning, and I want to -- I want to pull</p>
<p style="text-align: right;">Page 194</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And -- and I want to the ask you a</p> <p>3 follow-up. Mr. Schauer is asking where specifically you</p> <p>4 thought the fire started, whether it was on the --</p> <p>5 whether on the triplex or inside the house. And -- and</p> <p>6 my thought on this, or -- and I don't know whether you</p> <p>7 agree or not, but this would have -- this would have</p> <p>8 been a pretty energetic reaction when it occurred.</p> <p>9 Would you agree with that?</p> <p>10 A. Correct.</p> <p>11 Q. I mean, was this a slow fizzling fire when it</p> <p>12 would have started, or electrical fires like this, when</p> <p>13 you have -- when you -- when you have those, the</p> <p>14 neutrals come into contract with the hot wire, the two</p> <p>15 hot wires come together, is that a fairly energetic</p> <p>16 reaction?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And, I mean, how long -- the -- the --</p> <p>19 the -- I guess what I'm trying to get at is the reaction</p> <p>20 would have occurred both outside on the -- on the line</p> <p>21 and inside on the wires. Would that have occurred</p> <p>22 fairly rapidly?</p> <p>23 A. Very rapidly.</p> <p>24 Q. Okay. And -- and maybe a better way to -- to</p> <p>25 think about it for the jury is that it's not that the</p>	<p style="text-align: right;">Page 196</p> <p>1 up on my share screen something -- I've labeled this</p> <p>2 Exhibit 28.</p> <p>3 Are you familiar with the intersection of</p> <p>4 Buffalo and South Vista Drive?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And have you -- do you recall whether</p> <p>7 there's a fuse cutout there or not?</p> <p>8 A. I don't recall there was.</p> <p>9 Q. Okay.</p> <p>10 A. I haven't looked up on it, so I don't know. I</p> <p>11 never paid no attention. We drove around but I didn't</p> <p>12 see a cutout anywhere.</p> <p>13 Q. Is it possible that the cutout was installed</p> <p>14 recently or after the fire?</p> <p>15 A. I would say probably after the fire. That's</p> <p>16 what Mr. Cude had said.</p> <p>17 Q. Okay. And I pulled up on -- can you see</p> <p>18 the -- can you see the screen here? It's Exhibit 28.</p> <p>19 A. Yes.</p> <p>20 Q. Okay. Is that -- is that South Vista Drive</p> <p>21 and Buffalo Street?</p> <p>22 A. That could be right there, yes.</p> <p>23 Q. Okay. You're not sure.</p> <p>24 And -- well, I'm not going -- I'll</p> <p>25 represent to you that this is -- this is a Google image</p>

<p style="text-align: right;">Page 197</p> <p>1 from April 2011 that was pulled up on the Internet, and</p> <p>2 I don't see any -- any cutout there. But I guess --</p> <p>3 A. There's not one. Yeah, that is this thing,</p> <p>4 Buffalo.</p> <p>5 Q. And I don't know specifically what pole it's</p> <p>6 been installed on, if it -- if it is there, but it's</p> <p>7 possible that the cutout was installed after the fire,</p> <p>8 correct?</p> <p>9 A. That's correct.</p> <p>10 Q. And if -- if that were -- were the case,</p> <p>11 then -- then there would not have been a cutout on</p> <p>12 Mr. Cude's line at the time of the fire.</p> <p>13 A. There was no cutout at the time.</p> <p>14 Q. Now, Mr. Schauer talked a little bit about</p> <p>15 the -- I believe it was the NE -- NEC and whether AEP</p> <p>16 had to follow those guidelines. In your experience,</p> <p>17 does -- does AEP still have to follow industry standards</p> <p>18 and practices?</p> <p>19 A. They're supposed to.</p> <p>20 Q. Okay. And what's your opinion as -- as --</p> <p>21 with regard to maintenance of AEP? Is it within</p> <p>22 industry standards and practices?</p> <p>23 A. No.</p> <p>24 Q. Okay. How about -- I think the -- the</p> <p>25 question came with -- with regard to the size of a</p>	<p style="text-align: right;">Page 199</p> <p>1 particular wire looked too small for that. That's a</p> <p>2 solid number 8. It's got a kink in it too.</p> <p>3 Q. And I pulled up on the screen Exhibit 18</p> <p>4 again, and this is the ground wire you had identified at</p> <p>5 Mr. Cude's -- the transformer of Mr. Cude's former</p> <p>6 residence, correct?</p> <p>7 A. Correct.</p> <p>8 Q. Okay. And -- and -- you've been -- you've</p> <p>9 been a master electrician for many years. Can you</p> <p>10 recognize the difference between 4 and 8 ground wires?</p> <p>11 A. Pretty much. Pretty much.</p> <p>12 Q. Okay.</p> <p>13 A. They're real similar.</p> <p>14 Q. And you inspected this wire.</p> <p>15 A. Yes.</p> <p>16 Q. Can you tell the jury what size is this wire?</p> <p>17 A. I would say it's -- looks like a number 8.</p> <p>18 Q. Okay. And any other problems with this wire?</p> <p>19 A. Looks like it's got a kink in it and it's all</p> <p>20 corroded up.</p> <p>21 Q. Would that also be -- be a cause for concern?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. And -- and I want to go back because I</p> <p>24 think this is important. Even -- even if this had been</p> <p>25 correctly installed, if the transformer fuse didn't</p>
<p style="text-align: right;">Page 198</p> <p>1 ground wire. And -- and I'm going to pull that back up</p> <p>2 here just so the jury knows what we're talking about if</p> <p>3 you give me --</p> <p>4 A. Look right here will tell pretty much</p> <p>5 everything you need about linemens and the grounding,</p> <p>6 what they require. This is nationwide.</p> <p>7 Q. Okay. And is that -- is that an industry</p> <p>8 standard and practice that AEP --</p> <p>9 A. Yes.</p> <p>10 Q. And -- and what does that tell us about ground</p> <p>11 wires?</p> <p>12 A. It tells you about all the grounding wires,</p> <p>13 tells you all about transformers, substations, and on</p> <p>14 and on and on, anything about a linemen's book.</p> <p>15 Q. Okay.</p> <p>16 A. That's what a lineman has got to learn, what's</p> <p>17 in that book.</p> <p>18 Q. And with regard to the installation, the AEP</p> <p>19 installation of Mr. Cude's house, what -- what is that</p> <p>20 book, the linemen's book tell about? Was it done</p> <p>21 correctly? Was it ground correct? I mean, what were --</p> <p>22 A. Well, the grounding wire was not installed</p> <p>23 correctly according to this particular book. This</p> <p>24 should have been in number 4. And the ground rods</p> <p>25 should have been about three foot from there, and this</p>	<p style="text-align: right;">Page 200</p> <p>1 work, hadn't been properly maintained, whether it was</p> <p>2 rusted, whether it was too old, whatever reason it</p> <p>3 didn't work, just having this ground wire being the</p> <p>4 proper gauge, would that have stopped the fire?</p> <p>5 A. No.</p> <p>6 Q. Okay. So -- and my understanding from your</p> <p>7 testimony earlier was that the -- the fault was in</p> <p>8 the -- the fuse and the transformer, that was your</p> <p>9 conclusion. Do you agree with that?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And -- and that was based on, you know,</p> <p>12 as I understood it, the fact that even after the wire</p> <p>13 has melted through, the AEP wires continued to melt the</p> <p>14 truck and -- and continued to be live wires.</p> <p>15 A. Correct.</p> <p>16 Q. And wouldn't you agree with me, had -- had</p> <p>17 that fuse been properly working in the transformer, that</p> <p>18 should not have occurred.</p> <p>19 A. That shouldn't have occurred. It should have</p> <p>20 actually went down through that grounding conductor and</p> <p>21 it should have opened up those breakers and the fuse.</p> <p>22 Q. Okay. And so based on your -- your knowledge,</p> <p>23 your -- your experience, your background, the primary</p> <p>24 cause of the fire you believe was the -- the fuse in the</p> <p>25 AEP, or the malfunctioning fuse in the AEP transformer?</p>

<p>Page 201</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And I -- I think I asked you this</p> <p>3 before; I just want to be clear. Is -- is the -- the</p> <p>4 things that you -- you observed or that Mr. -- you know</p> <p>5 Mr. Cude and others observed at the fire, the -- the</p> <p>6 wires continuing to -- to serve electricity, is that --</p> <p>7 I mean, is that the sort of thing that you would have</p> <p>8 seen without some sort of fault on behalf of AEP?</p> <p>9 A. That's not supposed to happen on AEP. They</p> <p>10 should have them properly fused and a breaker in this</p> <p>11 case.</p> <p>12 Q. What's supposed to happen if -- if you have,</p> <p>13 you know, live wires coming into contact, you know,</p> <p>14 there -- there -- there comes a fault or they fall on a</p> <p>15 pickup like that? I mean, what should happen?</p> <p>16 A. It -- it should have went to ground and also</p> <p>17 should have opened up that breaker in this particular</p> <p>18 transformer.</p> <p>19 Q. Right. So that should have never happened.</p> <p>20 Regardless of all this other stuff, that should have</p> <p>21 never happened.</p> <p>22 A. Right. Amperage will open up a breaker and so</p> <p>23 will current.</p> <p>24 Q. Can you see on the screen I pulled up a new</p> <p>25 exhibit, 29, and this is the Distribution Standards</p>	<p>Page 203</p> <p>1 was -- I was flipping through this.</p> <p>2 And this preamble, this -- it talks about</p> <p>3 this is for -- for use by operating utilities, American</p> <p>4 Electric Power System. So that would be AEP. That</p> <p>5 would be the installation of the distribution network,</p> <p>6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. So AEP employees should follow this manual and</p> <p>9 the installation of -- of the transformer, ground wires,</p> <p>10 things of that sort, correct?</p> <p>11 A. Correct.</p> <p>12 Q. I'm going to try to highlight here, and you</p> <p>13 tell me, I may be off base here, but I'm not an expert</p> <p>14 on this stuff. But I did notice that this looks like --</p> <p>15 can you -- what does this page look like? Does this</p> <p>16 look like a page that explains installation of ground</p> <p>17 rods to you?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. Can you read that? And if not I can</p> <p>20 zoom in a little bit. I see they're talking about, I</p> <p>21 believe, the wire sizes there, the ground wires.</p> <p>22 A. Says number 4 copper.</p> <p>23 Q. Okay. And is that general industry standard?</p> <p>24 A. Pretty much.</p> <p>25 Q. Okay. And so you -- you'd expect AEP</p>
<p>Page 202</p> <p>1 Manual. It's from AEP.</p> <p>2 A. Okay.</p> <p>3 Q. Are you familiar with this at all?</p> <p>4 A. I haven't studied that book.</p> <p>5 Q. Okay. You haven't studied this because this</p> <p>6 is for AEP employees to study, correct?</p> <p>7 A. Right.</p> <p>8 Q. Okay. I mean, have you studied any of these</p> <p>9 distribution standard manuals before? Are you aware</p> <p>10 generally what's in them?</p> <p>11 A. The only one that I looked at is this</p> <p>12 particular book right here. There's several different</p> <p>13 engineers and installers and power companies that design</p> <p>14 this book.</p> <p>15 Q. But generally what's in your lineman's manual,</p> <p>16 should that be the same thing that's in the AEP manual?</p> <p>17 A. Pretty much.</p> <p>18 Q. Is that because it's an industry standard?</p> <p>19 A. Yeah.</p> <p>20 Q. Okay. And I'll admit to -- to -- to you, I</p> <p>21 haven't studied this whole AEP manual. It's 500 some --</p> <p>22 some pages long. I pulled the 18 pages here, and this</p> <p>23 was produced by AEP in this litigation. And -- I -- I</p> <p>24 understand you haven't reviewed it, and that's okay.</p> <p>25 But I do want to just scroll down here a little bit. I</p>	<p>Page 204</p> <p>1 employees to follow the same standards, correct?</p> <p>2 A. Correct.</p> <p>3 MR. SWALLOW: I think that's all I have</p> <p>4 for you, Mr. Winkfein, right now. I really appreciate</p> <p>5 your time today.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 EXAMINATION</p> <p>8 BY MR. SCHAUER:</p> <p>9 Q. Let me ask real quick here. I think you just</p> <p>10 said that amperage will open a breaker and so will</p> <p>11 current. Isn't that what you just said?</p> <p>12 A. That's what I said.</p> <p>13 Q. They're the same thing, aren't they,</p> <p>14 Mr. Winkfein --</p> <p>15 A. Well --</p> <p>16 Q. -- amperage and current?</p> <p>17 A. Well, amperage and voltage is what I meant.</p> <p>18 Q. Oh. So amperage and current you agree are the</p> <p>19 same thing, and you're telling us now you misspoke?</p> <p>20 A. Amperage and current is the same thing.</p> <p>21 Voltage will open up a breaker too.</p> <p>22 Q. Yeah. I know. You've already told us that.</p> <p>23 Okay.</p> <p>24 You -- you told us a while ago that even</p> <p>25 if -- if the transformer's breaker had functioned, the</p>

<p style="text-align: right;">Page 205</p> <p>1 ground wire would have made no difference, correct?</p> <p>2 A. It would have helped.</p> <p>3 Q. Well, you said -- you told Mr. Swallow it</p> <p>4 wouldn't have made any difference.</p> <p>5 A. Well, this particular ground wire would</p> <p>6 haven't made any difference.</p> <p>7 Q. Okay. And that's because why?</p> <p>8 A. It was all corroded up.</p> <p>9 Q. Corroded? It's made out of copper. How is it</p> <p>10 going to corrode, sir?</p> <p>11 A. Corroded -- it's corroded and it was kinked.</p> <p>12 Q. You're right, kinked. You're talking about</p> <p>13 a -- a wire of copper. How is a kink going to diminish</p> <p>14 at all --</p> <p>15 A. It diminishes -- diminishes the amperage</p> <p>16 effect, conductor's work. That number wire is only good</p> <p>17 for 50 amps. That's number 8 wire.</p> <p>18 Q. You're telling us that because it's got a kink</p> <p>19 in it or a bend in it, that --</p> <p>20 A. Encroaches.</p> <p>21 Q. What?</p> <p>22 A. Encroaches. Up on the transformer you can see</p> <p>23 where it's all rusted out too.</p> <p>24 Q. Sir, copper doesn't rust, does it?</p> <p>25 A. It corrodes.</p>	<p style="text-align: right;">Page 207</p> <p>1 then the ground wire wouldn't have made any difference?</p> <p>2 A. Apparently this did not make a difference.</p> <p>3 Q. Did you say it wouldn't have made a</p> <p>4 difference?</p> <p>5 A. If that ground wire is correctly installed, it</p> <p>6 wouldn't have made a difference.</p> <p>7 Q. That's not what you said a while ago. You</p> <p>8 said it wouldn't have made any difference.</p> <p>9 A. Don't confuse me right now.</p> <p>10 Q. I'm not trying to confuse you. I'm trying to</p> <p>11 figure out what you're really trying to testify to.</p> <p>12 A. If that ground wire was correctly installed</p> <p>13 you wouldn't have this Goddamn problem.</p> <p>14 Q. So you're saying if the ground wire was</p> <p>15 correct, none of this would have happened.</p> <p>16 A. That would have helped a whole lot.</p> <p>17 Q. Well, no, would it have helped a lot, or would</p> <p>18 it have solved the problem?</p> <p>19 A. It would have solved the ducking problem.</p> <p>20 Q. Okay. Good enough.</p> <p>21 Now, we already talked a while ago about</p> <p>22 the NEC, and he asked you about the NEC and how it</p> <p>23 applied to AEP. We went through the book, and you know</p> <p>24 that AEP doesn't have to comply to the NEC, correct?</p> <p>25 A. That's what it said on that book.</p>
<p style="text-align: right;">Page 206</p> <p>1 Q. It gets a -- it gets a green patina on it;</p> <p>2 that's it, right?</p> <p>3 A. It gets that and it also corrodes, and that</p> <p>4 transformer itself, that casing is metal, that's not</p> <p>5 copper.</p> <p>6 Q. Well, we're talking about the ground wire,</p> <p>7 aren't we?</p> <p>8 A. Yeah, but going to the transformer, that's</p> <p>9 metal, that is not copper.</p> <p>10 Q. I understand. What's that have to do with</p> <p>11 this case?</p> <p>12 A. It wasn't going -- making good connection to</p> <p>13 that metal casing. It was rusted. That's corrosive.</p> <p>14 Q. You're talking about where the ground wire</p> <p>15 joins the casing?</p> <p>16 A. Right.</p> <p>17 Q. You saw -- you saw -- we'll go back and look</p> <p>18 later.</p> <p>19 A. I've seen pictures of it.</p> <p>20 Q. Well, we've got the pictures.</p> <p>21 A. Well, I got them too.</p> <p>22 Q. Okay. So we'll go back and look and see if</p> <p>23 there's rust at the connection; we can go do that.</p> <p>24 But did you not say if the breaker did</p> <p>25 not work properly, the breaker inside the transformer,</p>	<p style="text-align: right;">Page 208</p> <p>1 Q. Okay. Now, have you ever served in a position</p> <p>2 as a lineman?</p> <p>3 A. No.</p> <p>4 Q. Okay. So you're talking about this lineman's</p> <p>5 handbook. Okay?</p> <p>6 A. Right.</p> <p>7 Q. Do you -- are you sure that that applies to</p> <p>8 the law in Texas?</p> <p>9 A. That applies to, like, the NEC, it goes</p> <p>10 nationwide.</p> <p>11 Q. That's the NEC. We're talk -- you're talking</p> <p>12 about the NEC again.</p> <p>13 A. I'm talking about NEC goes nationwide and also</p> <p>14 that hand -- lineman's handbook goes nationwide.</p> <p>15 Q. Okay. Do you know that under Texas law AEP is</p> <p>16 governed by the National Electric Safety Code, which is</p> <p>17 the NESC?</p> <p>18 A. That's fine.</p> <p>19 Q. Well, I just wondered if you knew that.</p> <p>20 A. I don't know that for a fact.</p> <p>21 Q. Okay. Do you have any evidence that this</p> <p>22 system, the transformer, all of that, did not meet the</p> <p>23 requirements of the NESC?</p> <p>24 A. It didn't work.</p> <p>25 Q. That's not what I asked you. Do you have any</p>

Page 209

1 evidence that it met -- it didn't meet the requirements
 2 of the NESC?
 3 **A. According to this transformer, it was wired**
 4 **correctly but it did not work.**
 5 Q. Well, you say it malfunctioned, right?
 6 **A. That's right.**
 7 Q. And I'm asking you if you know if that
 8 malfunction had anything to do with the requirements of
 9 the National Electric Safety Code?
 10 **A. I don't think it had any fault for that.**
 11 Q. Okay. You're not aware of anything, right?
 12 **A. Right.**
 13 Q. Okay. The transformer that we've been talking
 14 about, okay, is it still out there on that pole?
 15 **A. As far as I know. I haven't been over there.**
 16 Q. If it is, it's still working serving the
 17 neighbor's house, correct?
 18 **A. I don't know if they maintained it and fixed**
 19 **it or what. I have no idea what they did to it.**
 20 Q. Well, listen to my question. If it's the same
 21 transformer sitting there, it's still serving that
 22 neighbor's house, correct?
 23 **A. That's correct. No one is living in that**
 24 **house right now.**
 25 Q. What?

Page 210

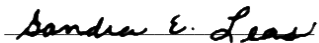
1 **A. There's no one living in that house at the**
 2 **moment.**
 3 Q. Well, if -- if it's got a malfunctioning
 4 breaker inside, wouldn't you expect that neighbor's
 5 house to burn down?
 6 **A. I would expect AEP to go out there and fix the**
 7 **problem in that transformer.**
 8 Q. Not what I asked you. Wouldn't you expect the
 9 neighbor's house to have burned down?
 10 **A. It would have.**
 11 Q. Okay.
 12 **A. If AEP wouldn't have fixed anything, they**
 13 **could have went in and fixed what was the problem with**
 14 **that transformer.**
 15 Q. So it would burn down if the transformer
 16 hasn't been repaired, correct?
 17 **A. Correct.**
 18 MR. SCHAUER: Okay. That's all I have.
 19 MR. SWALLOW: Thank you, Mr. Winkfein.
 20 THE VIDEOGRAPHER: The time is 3:55 p.m.
 21 We are now off the record.
 22 (Deposition concluded at 3:55 p.m.)
 23
 24
 25

Page 211

1 CHANGES AND SIGNATURE
 2 WITNESS NAME: BILL MARTIN WINKFEIN
 3 DATE OF DEPOSITION: OCTOBER 30, 2020
 4 PAGE LINE CHANGE REASON
 5 _____
 6 _____
 7 _____
 8 _____
 9 _____
 10 _____
 11 _____
 12 _____
 13 _____
 14 _____
 15 _____
 16 _____
 17 _____
 18 _____
 19 _____
 20 _____
 21 _____
 22 _____
 23 _____
 24 _____
 25 _____

Page 212

1 I, BILL MARTIN WINKFEIN, have read the foregoing
 2 deposition and hereby affix my signature
 3 that same is true and correct, except as noted above.
 4
 5 _____
 6 BILL MARTIN WINKFEIN
 7
 8 STATE OF _____
 9 COUNTY OF _____
 10 BEFORE ME, _____, on this
 11 day personally appeared BILL MARTIN WINKFEIN,
 12 known to me (or proved to me under oath of _____
 13 or through _____) (description of
 14 identity card or other document) to be the person whose
 15 name is subscribed to the foregoing instrument and
 16 acknowledged to me that they executed the same for the
 17 purposes and consideration therein expressed.
 18 Given under my hand and seal of office this
 19 _____ day of _____, _____.
 20
 21 _____
 22 NOTARY PUBLIC IN AND FOR
 23 THE STATE OF _____
 24 COMMISSION EXPIRES: _____
 25
 26 _____
 27 _____
 28 _____
 29 _____
 30 _____
 31 _____
 32 _____
 33 _____
 34 _____
 35 _____
 36 _____
 37 _____
 38 _____
 39 _____
 40 _____
 41 _____
 42 _____
 43 _____
 44 _____
 45 _____
 46 _____
 47 _____
 48 _____
 49 _____
 50 _____
 51 _____
 52 _____
 53 _____
 54 _____
 55 _____
 56 _____
 57 _____
 58 _____
 59 _____
 60 _____
 61 _____
 62 _____
 63 _____
 64 _____
 65 _____
 66 _____
 67 _____
 68 _____
 69 _____
 70 _____
 71 _____
 72 _____
 73 _____
 74 _____
 75 _____
 76 _____
 77 _____
 78 _____
 79 _____
 80 _____
 81 _____
 82 _____
 83 _____
 84 _____
 85 _____
 86 _____
 87 _____
 88 _____
 89 _____
 90 _____
 91 _____
 92 _____
 93 _____
 94 _____
 95 _____
 96 _____
 97 _____
 98 _____
 99 _____
 100 _____
 101 _____
 102 _____
 103 _____
 104 _____
 105 _____
 106 _____
 107 _____
 108 _____
 109 _____
 110 _____
 111 _____
 112 _____
 113 _____
 114 _____
 115 _____
 116 _____
 117 _____
 118 _____
 119 _____
 120 _____
 121 _____
 122 _____
 123 _____
 124 _____
 125 _____
 126 _____
 127 _____
 128 _____
 129 _____
 130 _____
 131 _____
 132 _____
 133 _____
 134 _____
 135 _____
 136 _____
 137 _____
 138 _____
 139 _____
 140 _____
 141 _____
 142 _____
 143 _____
 144 _____
 145 _____
 146 _____
 147 _____
 148 _____
 149 _____
 150 _____
 151 _____
 152 _____
 153 _____
 154 _____
 155 _____
 156 _____
 157 _____
 158 _____
 159 _____
 160 _____
 161 _____
 162 _____
 163 _____
 164 _____
 165 _____
 166 _____
 167 _____
 168 _____
 169 _____
 170 _____
 171 _____
 172 _____
 173 _____
 174 _____
 175 _____
 176 _____
 177 _____
 178 _____
 179 _____
 180 _____
 181 _____
 182 _____
 183 _____
 184 _____
 185 _____
 186 _____
 187 _____
 188 _____
 189 _____
 190 _____
 191 _____
 192 _____
 193 _____
 194 _____
 195 _____
 196 _____
 197 _____
 198 _____
 199 _____
 200 _____
 201 _____
 202 _____
 203 _____
 204 _____
 205 _____
 206 _____
 207 _____
 208 _____
 209 _____
 210 _____
 211 _____
 212 _____
 213 _____
 214 _____
 215 _____
 216 _____
 217 _____
 218 _____
 219 _____
 220 _____
 221 _____
 222 _____
 223 _____
 224 _____
 225 _____
 226 _____
 227 _____
 228 _____
 229 _____
 230 _____
 231 _____
 232 _____
 233 _____
 234 _____
 235 _____
 236 _____
 237 _____
 238 _____
 239 _____
 240 _____
 241 _____
 242 _____
 243 _____
 244 _____
 245 _____
 246 _____
 247 _____
 248 _____
 249 _____
 250 _____
 251 _____
 252 _____
 253 _____
 254 _____
 255 _____
 256 _____
 257 _____
 258 _____
 259 _____
 260 _____
 261 _____
 262 _____
 263 _____
 264 _____
 265 _____
 266 _____
 267 _____
 268 _____
 269 _____
 270 _____
 271 _____
 272 _____
 273 _____
 274 _____
 275 _____
 276 _____
 277 _____
 278 _____
 279 _____
 280 _____
 281 _____
 282 _____
 283 _____
 284 _____
 285 _____
 286 _____
 287 _____
 288 _____
 289 _____
 290 _____
 291 _____
 292 _____
 293 _____
 294 _____
 295 _____
 296 _____
 297 _____
 298 _____
 299 _____
 300 _____
 301 _____
 302 _____
 303 _____
 304 _____
 305 _____
 306 _____
 307 _____
 308 _____
 309 _____
 310 _____
 311 _____
 312 _____
 313 _____
 314 _____
 315 _____
 316 _____
 317 _____
 318 _____
 319 _____
 320 _____
 321 _____
 322 _____
 323 _____
 324 _____
 325 _____
 326 _____
 327 _____
 328 _____
 329 _____
 330 _____
 331 _____
 332 _____
 333 _____
 334 _____
 335 _____
 336 _____
 337 _____
 338 _____
 339 _____
 340 _____
 341 _____
 342 _____
 343 _____
 344 _____
 345 _____
 346 _____
 347 _____
 348 _____
 349 _____
 350 _____
 351 _____
 352 _____
 353 _____
 354 _____
 355 _____
 356 _____
 357 _____
 358 _____
 359 _____
 360 _____
 361 _____
 362 _____
 363 _____
 364 _____
 365 _____
 366 _____
 367 _____
 368 _____
 369 _____
 370 _____
 371 _____
 372 _____
 373 _____
 374 _____
 375 _____
 376 _____
 377 _____
 378 _____
 379 _____
 380 _____
 381 _____
 382 _____
 383 _____
 384 _____
 385 _____
 386 _____
 387 _____
 388 _____
 389 _____
 390 _____
 391 _____
 392 _____
 393 _____
 394 _____
 395 _____
 396 _____
 397 _____
 398 _____
 399 _____
 400 _____
 401 _____
 402 _____
 403 _____
 404 _____
 405 _____
 406 _____
 407 _____
 408 _____
 409 _____
 410 _____
 411 _____
 412 _____
 413 _____
 414 _____
 415 _____
 416 _____
 417 _____
 418 _____
 419 _____
 420 _____
 421 _____
 422 _____
 423 _____
 424 _____
 425 _____
 426 _____
 427 _____
 428 _____
 429 _____
 430 _____
 431 _____
 432 _____
 433 _____
 434 _____
 435 _____
 436 _____
 437 _____
 438 _____
 439 _____
 440 _____
 441 _____
 442 _____
 443 _____
 444 _____
 445 _____
 446 _____
 447 _____
 448 _____
 449 _____
 450 _____
 451 _____
 452 _____
 453 _____
 454 _____
 455 _____
 456 _____
 457 _____
 458 _____
 459 _____
 460 _____
 461 _____
 462 _____
 463 _____
 464 _____
 465 _____
 466 _____
 467 _____
 468 _____
 469 _____
 470 _____
 471 _____
 472 _____
 473 _____
 474 _____
 475 _____
 476 _____
 477 _____
 478 _____
 479 _____
 480 _____
 481 _____
 482 _____
 483 _____
 484 _____
 485 _____
 486 _____
 487 _____
 488 _____
 489 _____
 490 _____
 491 _____
 492 _____
 493 _____
 494 _____
 495 _____
 496 _____
 497 _____
 498 _____
 499 _____
 500 _____
 501 _____
 502 _____
 503 _____
 504 _____
 505 _____
 506 _____
 507 _____
 508 _____
 509 _____
 510 _____
 511 _____
 512 _____
 513 _____
 514 _____
 515 _____
 516 _____
 517 _____
 518 _____
 519 _____
 520 _____
 521 _____
 522 _____
 523 _____
 524 _____
 525 _____
 526 _____
 527 _____
 528 _____
 529 _____
 530 _____
 531 _____
 532 _____
 533 _____
 534 _____
 535 _____
 536 _____
 537 _____
 538 _____
 539 _____
 540 _____
 541 _____
 542 _____
 543 _____
 544 _____
 545 _____
 546 _____
 547 _____
 548 _____
 549 _____
 550 _____
 551 _____
 552 _____
 553 _____
 554 _____
 555 _____
 556 _____
 557 _____
 558 _____
 559 _____
 560 _____
 561 _____
 562 _____
 563 _____
 564 _____
 565 _____
 566 _____
 567 _____
 568 _____
 569 _____
 570 _____
 571 _____
 572 _____
 573 _____
 574 _____
 575 _____
 576 _____
 577 _____
 578 _____
 579 _____
 580 _____
 581 _____
 582 _____
 583 _____
 584 _____
 585 _____
 586 _____
 587 _____
 588 _____
 589 _____
 590 _____
 591 _____
 592 _____
 593 _____
 594 _____
 595 _____
 596 _____
 597 _____
 598 _____
 599 _____
 600 _____
 601 _____
 602 _____
 603 _____
 604 _____
 605 _____
 606 _____
 607 _____
 608 _____
 609 _____
 610 _____
 611 _____
 612 _____
 613 _____
 614 _____
 615 _____
 616 _____
 617 _____
 618 _____
 619 _____
 620 _____
 621 _____
 622 _____
 623 _____
 624 _____
 625 _____
 626 _____
 627 _____
 628 _____
 629 _____
 630 _____
 631 _____
 632 _____
 633 _____
 634 _____
 635 _____
 636 _____
 637 _____
 638 _____
 639 _____
 640 _____
 641 _____
 642 _____
 643 _____
 644 _____
 645 _____
 646 _____
 647 _____
 648 _____
 649 _____
 650 _____
 651 _____
 652 _____
 653 _____
 654 _____
 655 _____
 656 _____
 657 _____
 658 _____
 659 _____
 660 _____
 661 _____
 662 _____
 663 _____
 664 _____
 665 _____
 666 _____
 667 _____
 668 _____
 669 _____
 670 _____
 671 _____
 672 _____
 673 _____
 674 _____
 675 _____
 676 _____
 677 _____
 678 _____
 679 _____
 680 _____
 681 _____
 682 _____
 683 _____
 684 _____
 685 _____
 686 _____
 687 _____
 688 _____
 689 _____
 690 _____
 691 _____
 692 _____
 693 _____
 694 _____
 695 _____
 696 _____
 697 _____
 698 _____
 699 _____
 700 _____
 701 _____
 702 _____
 703 _____
 704 _____
 705 _____
 706 _____
 707 _____
 708 _____
 709 _____
 710 _____
 711 _____
 712 _____
 713 _____
 714 _____
 715 _____
 716 _____
 717 _____
 718 _____
 719 _____
 720 _____
 721 _____
 722 _____
 723 _____
 724 _____
 725 _____
 726 _____
 727 _____
 728 _____
 729 _____
 730 _____
 731 _____
 732 _____
 733 _____
 734 _____
 735 _____
 736 _____
 737 _____
 738 _____
 739 _____
 740 _____
 741 _____
 742 _____
 743 _____
 744 _____
 745 _____
 746 _____
 747 _____
 748 _____
 749 _____
 750 _____
 751 _____
 752 _____
 753 _____
 754 _____
 755 _____
 756 _____
 757 _____
 758 _____
 759 _____
 760 _____
 761 _____
 762 _____
 763 _____
 764 _____
 765 _____
 766 _____
 767 _____
 768 _____
 769 _____
 770 _____
 771 _____
 772 _____
 773 _____
 774 _____
 775 _____
 776 _____
 777 _____
 778 _____
 779 _____
 780 _____
 781 _____
 782 _____
 783 _____
 784 _____
 785 _____
 786 _____
 787 _____
 788 _____
 789 _____
 790 _____
 791 _____
 792 _____
 793 _____
 794 _____
 795 _____
 796 _____
 797 _____
 798 _____
 799 _____
 800 _____
 801 _____
 802 _____
 803 _____
 804 _____
 805 _____
 806 _____
 807 _____
 808 _____
 809 _____
 810 _____
 811 _____
 812 _____
 813 _____
 814 _____
 815 _____
 816 _____
 817 _____
 818 _____
 819 _____
 820 _____
 821 _____
 822 _____
 823 _____
 824 _____
 825 _____
 826 _____
 827 _____
 828 _____
 829 _____
 830 _____
 831 _____
 832 _____
 833 _____
 834 _____
 835 _____
 836 _____
 837 _____
 838 _____
 839 _____
 840 _____
 841 _____
 842 _____
 843 _____
 844 _____
 845 _____
 846 _____
 847 _____
 848 _____
 849 _____
 850 _____
 851 _____
 852 _____
 853 _____
 854 _____
 855 _____
 856 _____
 857 _____
 858 _____
 859 _____
 860 _____
 861 _____
 862 _____
 863 _____
 864 _____
 865 _____
 866 _____
 867 _____
 868 _____
 869 _____
 870 _____
 871 _____
 872 _____
 873 _____
 874 _____
 875 _____
 876 _____
 877 _____
 878 _____
 879 _____
 880 _____
 881 _____
 882 _____
 883 _____
 884 _____
 885 _____
 886 _____
 887 _____
 888 _____
 889 _____
 890 _____
 891 _____
 892 _____
 893 _____
 894 _____
 895 _____
 896 _____
 897 _____
 898 _____
 899 _____
 900 _____
 901 _____
 902 _____
 903 _____
 904 _____
 905 _____
 906 _____
 907 _____
 908 _____
 909 _____
 910 _____
 911 _____
 912 _____
 913 _____
 914 _____
 915 _____
 916 _____
 917 _____
 918 _____
 919 _____
 920 _____
 921 _____
 922 _____
 923 _____
 924 _____
 925 _____
 926 _____
 927 _____
 928 _____
 929 _____
 930 _____
 931 _____
 932 _____
 933 _____
 934 _____
 935 _____
 936 _____
 937 _____
 938 _____
 939 _____
 940 _____
 941 _____
 942 _____
 943 _____
 944 _____
 945 _____
 946 _____
 947 _____
 948 _____
 949 _____
 950 _____
 951 _____
 952 _____
 953 _____
 954 _____
 955 _____
 956 _____
 957 _____
 958 _____
 959 _____
 960 _____
 961 _____
 962 _____
 963 _____
 964 _____
 965 _____
 966 _____
 967 _____
 968 _____
 969 _____
 970 _____
 971 _____
 972 _____
 973 _____
 974 _____
 975 _____
 976 _____
 977 _____
 978 _____
 979 _____
 980 _____
 981 _____
 982 _____
 983 _____
 984 _____
 985 _____
 986 _____
 987 _____
 988 _____
 989 _____
 990 _____
 991 _____
 992 _____
 993 _____
 994 _____
 995 _____
 996 _____
 997 _____
 998 _____
 999 _____
 1000 _____
 1001 _____
 1002 _____
 1003 _____
 1004 _____
 1005 _____
 1006 _____
 1007 _____
 1008 _____
 1009 _____
 1010 _____
 1011 _____
 1012 _____
 1013 _____
 1014 _____
 1015 _____
 1016 _____
 1017 _____
 1018 _____
 1019 _____
 1020 _____
 1021 _____
 1022 _____
 1023 _____
 1024 _____
 1025 _____
 1026 _____
 1027 _____
 1028 _____
 1029 _____
 1030 _____
 1031 _____
 1032 _____
 1033 _____
 1034 _____
 1035 _____
 1036 _____
 1037 _____
 1038 _____
 1039 _____
 1040 _____
 1041 _____
 1042 _____
 1043 _____
 1044 _____
 1045 _____
 1046 _____
 1047 _____
 1048 _____
 1049 _____
 1050 _____
 1051 _____
 1052 _____
 1053 _____
 1054 _____
 1055 _____
 1056 _____
 1057 _____
 1058 _____
 1059 _____
 1060 _____
 1061 _____
 1062 _____
 1063 _____
 1064 _____
 1065 _____
 1066 _____
 1067 _____
 1068 _____
 1069 _____
 1070 _____
 1071 _____
 1072 _____
 1073 _____
 1074 _____
 1075 _____
 1076 _____
 1077 _____
 1078 _____
 1079 _____
 1080 _____
 1081 _____
 1082 _____
 1083 _____
 1084 _____
 1085

<p>1 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS</p> <p>2 CORPUS CHRISTI DIVISION</p> <p>3 WALTON CUDE)) 4 Plaintiff)) 5 V.) CIVIL ACTION NO. 2:19cv388) 6 AEP TEXAS, INC.)) 7 Defendant)</p> <p>8 REPORTER'S CERTIFICATION OF THE ORAL DEPOSITION OF BILL MARTIN WINKFEIN</p> <p>9 OCTOBER 30, 2020</p> <p>10 I, SANDRA E. LEAS, a Certified Shorthand Reporter and Notary Public in and for the State of 11 Texas, hereby certify to the following: 12 That the witness, BILL MARTIN WINKFEIN, was duly sworn by the officer and that the transcript of the oral 13 deposition is a true record of the testimony given by the witness;</p> <p>14 That the original deposition was delivered to 15 MR. JOHN SWALLOW; 16 That a copy of this certificate was served on all parties and/or the witness shown herein on 17 _____.</p> <p>18 That the amount of time used by each party at the deposition is as follows:</p> <p>19 Mr. John Swallow - 2 hours, 35 minutes Mr. G. Don Schauer - 1 hour, 30 minutes</p> <p>20 That pursuant to information given to the deposition officer at the time said testimony was taken, 22 the following includes counsel for all parties of record:</p> <p>23 COUNSEL FOR THE PLAINTIFF:</p> <p>24 Mr. John Swallow 25 Mr. Jacob Hubert</p>	<p>Page 213</p>
<p>1 HUSEMAN LAW FIRM 615 N. Upper Broadway 2 Suite 2000 Corpus Christi, Texas 78401 3 361-883-3563 jswallow@husemanlawfirm.com 4 jhubert@husemanlawfirm.com 5 COUNSEL FOR THE DEFENDANT: 6 Mr. G. Don Schauer SCHAUER & SIMANK, P.C. 615 N. Upper Broadway 7 Suite 700 Corpus Christi, Texas 78401-0781 8 361-884-2800 dschauer@cctlaw.com</p> <p>9 I further certify that pursuant to FRCP Rule 10 30(f)(1) that the signature of the deponent:</p> <p>11 _____</p> <p>12 _____ was requested by the deponent or a party before the completion of the deposition and that the signature is to be before any notary public and returned 13 within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page 14 contains any changes and the reasons therefore: 15 _____ was not requested by the deponent or a party before the completion of the deposition.</p> <p>16 I further certify that I am neither Counsel for, 17 related to, nor employed by any of the parties or attorneys in the action in which this proceeding was 18 taken, and further that I am not financially or otherwise interested in the outcome of the action.</p> <p>19 Certified to by me on this the 20th day of 20 November, 2020.</p> <p>21 </p> <p>22 SANDRA E. LEAS, Texas CSR 6929 Expiration Date: 4/30/2021 23 Lexitas - Firm Reg. No. 793 100 E. Ferguson, Suite 900 24 Tyler, Texas 75702 Phone: 903.593.3213</p> <p>25</p>	<p>Page 214</p>

<p style="text-align: center;">\$</p> <hr/> <p>\$80 18:10</p> <hr/> <p style="text-align: center;">1</p> <hr/> <p>1 6:2 12:9,17 19:10 72:21 78:12 121:18 125:7,15</p> <p>10 19:21 24:8 62:22 63:3 72:21 73:15 97:8 123:7 184:13</p> <p>10-foot 39:4</p> <p>100,000 178:1</p> <p>100-amp 131:2</p> <p>10:06 6:4</p> <p>10:11 11:14,16</p> <p>10:13 11:16,17</p> <p>10:40 31:19,21</p> <p>10:41 31:21,22</p> <p>11 8:17 9:10 64:24 124:24</p> <p>110 165:2</p> <p>1110 20:6 73:15</p> <p>11:10 55:3,4</p> <p>11:11 11:14</p> <p>11:20 55:4,5</p> <p>12 24:9 67:16</p> <p>12,000 35:15</p> <p>120 35:13 36:6 42:8 44:21 47:16,19 82:18 90:20 143:23</p> <p>120-volt 90:17 156:13</p> <p>125-amp 23:11</p> <p>12:17 103:12,13</p> <p>13 34:11 67:24 68:18</p> <p>135 8:15</p> <p>14 68:21</p>	<p>15 73:11,12</p> <p>16 86:20</p> <p>17 81:24 82:4</p> <p>18 50:18 51:18 52:4 199:3 202:22</p> <p>19 44:13,14 46:7 48:13 51:7</p> <p>1964 79:21 100:17 158:3</p> <p>1970 14:17</p> <p>1974 14:10</p> <p>19th 30:23 114:4</p> <p>1:17 103:13,14</p> <p>1:41 121:19,20</p> <p>1:53 121:20,21</p> <hr/> <p style="text-align: center;">2</p> <hr/> <p>2 20:24 69:13 126:19 139:1,3</p> <p>2,000 15:19</p> <p>20 47:9,11 51:8,9,14 157:14 177:12,16</p> <p>20- 17:8</p> <p>20-amp 177:10</p> <p>200-amp 20:18 21:24 109:7 130:23 131:1 135:24</p> <p>2011 20:13 22:16,19 30:4, 20,21 69:20 70:23 96:6 128:9,11,12,16 197:1</p> <p>2017 30:23 31:4 114:4 117:7</p> <p>2019 127:6,16</p> <p>2020 6:4</p> <p>20s 22:3,4</p> <p>21 77:11 78:2,5 80:14</p> <p>22 115:18,22</p>	<p>23 116:17 117:24</p> <p>24 108:23 109:3</p> <p>240 35:13 36:5 42:8 47:20 82:19 90:25 92:14 144:2, 23,25 145:3,6 152:10 156:13,15 162:9 163:25 164:5 193:8,14,15,23</p> <p>240-volt 90:18</p> <p>245 145:6</p> <p>25 36:9</p> <p>250 132:4</p> <p>26 96:16,23 97:23</p> <p>27 6:2 109:20</p> <p>28 196:2,18</p> <p>29 201:25</p> <p>2:55 174:21,23</p> <hr/> <p style="text-align: center;">3</p> <hr/> <p>3 56:15 57:5 133:8 143:12, 15</p> <p>30 127:16</p> <p>30-amp 17:8</p> <p>30-something 13:6</p> <p>300 98:14</p> <p>30s 22:4</p> <p>30th 6:4 127:6</p> <p>3:13 174:23,24</p> <p>3:55 210:20,22</p> <hr/> <p style="text-align: center;">4</p> <hr/> <p>4 28:24 29:3 53:8,10,11, 12,19,24 54:3,10 59:3,25 111:13,14,15 143:20 161:20,24 171:8,9,17 172:2 195:20 198:24 199:10 203:22</p>
---	--	---

450-3A 98:8	132:6 171:7 199:2,10,17 205:17	add 96:10 131:4 187:15
480 35:16	8-16-1948 124:20	added 22:25 23:3 27:5 148:20
<hr/> 5 <hr/>	8-foot 39:3	additional 108:3
5 60:7 137:20 172:19 191:11	8th 95:21	address 7:20 124:24
5/8 132:6	<hr/> 9 <hr/>	adjust 11:7 103:4
50 205:17	9 62:8 123:8	admit 202:20
50-amp 164:23	90 172:9,11 174:11 187:3	AEP 18:15 24:1,2 25:1,5, 12 42:6 53:10 54:6 55:14, 15,21,22,23 56:1,10 57:2, 5 58:12 61:8 72:5 76:3 78:23 87:24 90:6 94:18 97:3,13 99:2,5 104:15 110:1,3,22,25 111:13,20, 22 117:25 122:7 133:3,4 134:10 142:25 150:12,16, 19 153:18,23 154:18 158:16 171:8,16 173:8 181:17 182:6,13 183:9 189:15 190:3 191:9,21 192:1,2 193:10 197:15, 17,21 198:8,18 200:13,25 201:8,9 202:1,6,16,21,23 203:4,8,25 207:23,24 208:15 210:6,12
500 202:21	90-2B5 172:24	AEP's 63:15,20 67:18 76:10 104:13 109:21 110:8 155:19
50s 22:5	90.-2 172:12	AEPS 164:6
595 7:22	90.5 172:23	aerial 141:12
<hr/> 6 <hr/>	921 165:18 166:1	affected 113:23 115:3 152:15 160:19
6 23:11 38:24 60:24 145:14	<hr/> A <hr/>	aftereffects 166:11
6-wire 29:7	a.m. 6:4 11:16,17 31:19, 21,22 55:3,4,5 161:20 195:20	age 100:16
6/3 23:1	absence 90:2	agree 37:14 74:9 79:8 107:8,11 109:17 158:20, 22 165:4 193:24 194:7,9 200:9,16 204:18
60 23:12 29:7	absolutely 173:8	agreements 6:9
60-amp 17:8	AC 43:7	ahead 6:14 59:21 106:15 158:13
600 98:12,22,25	acceptable 138:6	
64 79:18	accessible 99:18	
<hr/> 7 <hr/>	accident 49:4 89:23,25 90:4,6	
7 62:3,4,9 146:15	accurate 36:12 96:20 116:14	
70 14:9	accurately 22:7,9 51:3,10 52:4,16,17 58:1 59:25 60:12 61:2,19 62:12 63:5 66:21 67:21 68:19 69:9, 18 73:22 74:10 79:10 82:9 85:13 116:11	
72 124:21	act 37:12	
7200 35:2 42:7 98:24	active 60:21 61:13 62:18	
7200-volt 34:15	actual 93:24 190:6	
7200-volts 35:11		
74 14:18,19		
<hr/> 8 <hr/>		
8 53:9,19 54:2 62:4,9		

air 23:5 30:12 33:9
144:11,13,17 148:20
149:10,13

Alabama 14:25

alternatives 94:24

altogether 184:14

aluminum 76:8

American 55:16 109:21
191:13 203:3

amount 14:4 15:10 124:7
193:18

amperage 162:7,17,19,22,
23 163:13 164:1 176:16,
21,25 177:3,4,13,14,15,
22,24 178:6,10 179:12
180:6,10 201:22 204:10,
16,17,18,20 205:15

amps 23:12 29:7 177:12,
16 178:2 205:17

analysis 120:11

any- 87:18

anymore 32:4 144:13
155:21 187:2

apartment 15:7,25

apiece 47:17

apparently 40:7 88:1
97:17 102:11 114:5 165:7
169:15 207:2

appeared 114:14

appears 156:12

appliances 33:15 138:7

applied 207:23

applies 171:22 208:7,9

approximately 24:8
109:15 124:6 162:9 182:8
184:13

April 197:1

arc 107:3 157:5,8 160:19

163:1

arced 183:5

architects 191:14

arcing 86:2,5 87:12 88:1,
15,17,21 89:2,20 90:11
106:6,21 120:2,9,16
157:14 161:17 162:3,18
175:18,20 176:13 182:21
195:10,14

area 9:8 16:25 23:2,8
33:6,7,12 34:22 35:4
36:13 59:14 64:18 65:4
67:15 69:25 70:1,11,19
71:6 72:9,15 73:4 85:24
100:22,23 111:21 117:21
148:14,18,19,21 149:8
159:19

areas 33:25 40:14 57:21
151:21 152:10

arguing 176:9

argument 190:4

Arkansas 13:1

arrestor 36:19 38:18
168:14

arrow 83:1

Arrow- 9:9

Arrowhead 8:20,23 9:9
19:22 34:5 55:10,24 56:7
58:7 60:24 62:16 63:3
64:20 65:1 68:24 69:24,
25 70:10 72:8,13 84:24
111:19 189:10,14,18

Arrowhead's 72:15

Arsenal 15:1

Article 132:4 172:9,11
174:10

ashes 89:8

asks 9:21 192:24

assessment 107:8

assume 176:8,10

Athens 79:25

attach 135:7,15

attached 73:7 125:19,23
135:9,16 139:16,19,21
140:1,3 170:23

attaches 170:17

attention 196:11

attorney 7:15

attorneys 123:12,13

audio 11:7

August 117:7

authority 173:14

aware 22:18 58:22 189:21
202:9 209:11

awhile 130:14

B

bachelor's 14:12 184:10

back 17:24 19:10 20:21
22:1,15 25:16 30:4 40:23
43:10,12 45:12 46:9,25
48:13 49:1 50:9 51:7,18
52:21,22 69:13,20 70:22
72:7 77:4 82:20 90:19
91:2 103:16 104:8 105:8,
12 106:18,19 121:4,7
122:15 128:4 130:17
139:1 142:20 143:11,14
148:10 170:9 186:11
198:1 199:23 206:17,22

back-up 17:25

background 13:22 17:12
106:2 183:22 200:23

bad 7:2 84:11,12 100:11
130:20 178:22

bag 185:8

bandsaw 149:11

bandsaws 149:2	81:17 83:17 90:8 94:10	143:15 156:17,18 162:14
bar 90:22 137:8 156:16	95:5,6,18 97:24 101:17	164:6,7,24 165:1,3
barbecue 91:15	105:19 107:17 112:25	184:18
bars 168:6	117:17,18,23 145:1,2,4	boxes 71:2 112:21
base 100:20 203:13	147:8 154:24 193:5,6,8	brace 114:10,22
based 32:25 41:7,10	197:14 202:25 203:20	braces 65:10
78:25 79:7 80:2,8 105:25	black 68:9 75:8 134:21	branch 22:2 26:9 57:17
120:4 189:1 200:11,22	135:20 143:17,23 144:1	branched 28:7 57:20
basically 34:1 81:20	blocked 27:17	branches 33:24
111:6 174:3	blow 160:7 177:22	brand 17:4 20:17,18,22
basing 81:5	blowing 160:11,17 183:2	25:16
basis 106:10	195:7,8	break 9:23 11:7,16 31:16,
bat 31:9	blue 26:7 136:3	21 54:21 55:4 77:19
beams 80:15	blueprints 16:4	99:22 103:4,13,21,23
Bear 108:21	body 128:4	104:6 121:6,20 174:14,
began 160:17,19	bolts 10:17	19,20,23 175:2
beginning 9:13 160:7	bonded 38:25 39:1 42:18	breaker 17:8 20:19 21:17,
behalf 90:3 201:8	47:25 75:21 82:16 90:16	23,24 26:9 33:13 40:3,12,
belive 73:21	107:18 108:16 156:12	15 50:8,10 76:18 77:9
belongs 134:11,13	163:11 170:15	78:11 80:19 81:3 92:3
bend 73:6 205:19	bonding 47:23 48:5,6	94:20 98:13 99:17 100:3
bent 155:6	book 18:10 95:12 96:20	105:5,20 106:18 107:20
Berry 112:2	173:16 186:25 187:1	108:18 109:8 134:18
bet 21:6	188:4 198:14,17,20,23	135:24,25 136:4,19
big 9:24 29:9 175:10	202:4,12,14 207:23,25	137:1,2,4,13,15 139:1
bill 6:8,18,24 7:13 44:15,	booklet 191:12,19	140:17,23 141:7 143:15
17 72:25 73:12 78:4	bottom 26:6 48:15,17	156:22 162:11 163:18,23
158:19 174:17	78:7,10 80:19,20 105:22	164:23 167:2 168:13
birth 124:19	127:3 134:16 136:9,16,	176:25 177:5,7,8 178:10,
bit 11:4 13:21 15:14,20,22	18,19,24 144:5,8 170:24	12,16,21 180:3,6,9,14
17:17,19,20 19:19 24:3	bought 128:21,22,23	190:14 201:10,17,22
25:20 26:24 29:11 35:23	129:20,21 130:4 148:11	204:10,21,25 206:24,25
37:9 39:15 41:17 43:11	149:21	210:4
44:3 45:15 46:11 48:16	box 13:14 20:16,18,19,21,	breakers 17:7 20:18 21:18
52:23 53:16,22 56:14	22 21:10 24:7 25:25	92:4,6,20,23 93:2,4,12
62:21,23 63:11 68:8,12	28:19,21 33:24 40:20	106:14,16 140:20 177:11
72:25 73:3 79:12 80:22	42:20 50:8 57:18 69:14,	179:4 200:21
	19 70:22 85:7 91:1,25	briefly 33:18
	92:10,21 130:20 131:7	bring 24:19 52:21 95:9
	134:18 136:9,19,24	126:1,7 137:19
	137:1,2 138:19 139:1,3	brings 34:21

<p>broken 155:6 157:8</p> <p>Brotherhood 12:10 14:3</p> <p>brought 23:11,12 27:22 52:20 126:8</p> <p>bucket 18:19 88:4</p> <p>buckets 100:24</p> <p>Buffalo 58:14 168:23 196:4,21 197:4</p> <p>building 192:1</p> <p>buildings 15:7,25 17:24 191:16</p> <p>built 20:8,17 158:3 175:10</p> <p>bunch 73:5 131:11 176:13 189:8,24</p> <p>burn 88:2 114:3 139:14 175:13,14 183:10 210:5, 15</p> <p>burned 20:4 82:6 87:11 89:4 92:13,16 93:14 129:15 139:17,21 140:20 141:4 156:18 163:25 164:7 165:15 166:15 181:1 183:19 210:9</p> <p>burning 74:5 88:15 90:14 93:11 113:24 114:25 115:15</p> <p>burnt 62:25 69:2 73:7 74:24 75:2,14 81:22 83:22 101:9 102:4 105:6 114:13 139:20 182:20</p> <p>bus 137:8</p> <p>bushes 61:9</p> <p>bushing 26:7</p> <p>business 18:11</p> <p>buy 18:9 129:17,19 148:10</p>	<p style="text-align: center;">C</p> <p>Cableman's 95:20 96:24</p> <p>caked 54:16</p> <p>calculate 162:21 163:13 176:18</p> <p>call 15:3,4 17:5 45:20 48:3 49:12 70:9 71:10 103:9 112:9 133:21 134:8</p> <p>called 14:25 17:9,24 18:14,15 23:3 24:12 36:9, 24 37:24 38:6 41:21 43:3 46:1 47:23 63:20 84:21 86:20 109:21 112:21 115:18 116:17 142:25 153:23</p> <p>camera 53:15 95:16</p> <p>card 12:14,16</p> <p>cardboard 184:18</p> <p>cards 12:7 13:9</p> <p>care 61:8 67:18 97:11</p> <p>careful 107:15</p> <p>carry 38:16</p> <p>case 9:1 15:21 19:16 25:10 35:11 36:5 38:2 45:24 55:15 59:16 60:11, 14 73:2 97:3 104:14,17 118:1 122:7 153:19 170:22 175:25 182:13 188:13,21 193:10 197:10 201:11 206:11</p> <p>cases 153:11</p> <p>casing 206:4,13,15</p> <p>catch 91:20</p> <p>catches 91:15</p> <p>caught 91:4,5 92:17,25 101:22 102:12</p> <p>caused 50:14 69:3 84:2, 10,11 89:19,20 94:25</p>	<p>106:5 107:12 108:3 162:4,15 166:12,17</p> <p>causing 139:13 162:18</p> <p>certificate 14:1</p> <p>certificates 13:9</p> <p>certification 11:21 12:13 18:12 185:16</p> <p>certifications 11:24 13:8 18:2,23</p> <p>certified 18:20 29:17</p> <p>certifies 19:1</p> <p>chance 104:18 107:5 108:6 110:12</p> <p>changed 22:24</p> <p>charcoal 91:14</p> <p>charging 188:19</p> <p>check 151:2</p> <p>checked 112:20</p> <p>chemical 15:8</p> <p>Christi 71:6 72:17,19,21</p> <p>circle 66:12 78:10 82:23, 24</p> <p>circles 66:25</p> <p>circuit 98:13 99:22 144:10 165:3 181:12</p> <p>circuits 22:2 43:21 57:17 92:3 156:20 165:2</p> <p>circumstance 94:2</p> <p>city 34:1 71:11</p> <p>clamp 29:4</p> <p>clamps 29:5</p> <p>clarification 9:22</p> <p>clarify 87:2</p> <p>clear 61:10 201:3</p> <p>climb 78:15</p>
---	--	---

climbed 79:5	components 36:16	178:24 195:13
close 24:10 37:7 178:12	compressor 23:5 33:9 148:20 149:11,13	conduit 24:7,17 29:4 135:10 144:17
close-up 62:7	computer 11:4,8 15:2 77:15	confuse 207:9,10
closer 10:24 11:4,5 37:8,9 47:10,12	concern 199:21	connect 48:18,21 153:8
closest 168:18	concerned 33:1,8,16 71:22	connected 25:1 42:17 113:9 114:2 137:6 154:15 155:5,18,19 170:13 178:24
clue 183:15	concluded 210:22	connecting 153:5
Co-op 189:16	conclusion 89:12,13 100:21 104:23 200:9	connection 25:13 48:3,4 60:21 61:13 62:19 64:14 157:15 186:6 206:12,23
coast 12:4	conclusions 109:18	connections 17:1,2,16 47:3,6,12 112:10
coating 25:23	condition 51:4,10 52:5,17 58:2,6 60:1 69:19 74:10	connects 17:11 48:19
code 16:6 28:16,19 29:22 37:20 70:7 72:1 96:4,24 98:3,10 100:7 131:14,15, 16 132:2 172:18,25 173:4 187:7,12,17,18,19 188:2 189:2,5 208:16 209:9	conditioner 30:13 144:11, 13	constant 40:18,19 42:19 81:7,11 83:25 92:9,12 93:7 105:4 162:12,14
codes 97:25	conditioning 144:17	consulting 97:1
coffeemaker 50:5	conditions 69:10 195:21	contact 195:10 201:13
collect 105:14	conducted 6:7 106:1	contents 92:21
college 184:13	conductive 119:25 195:18	continue 11:21 54:21 103:17 121:25
comments 61:5	conductor 22:2 23:1 25:23 36:3 39:1,2 41:21, 22,23 42:5,16 43:4,16 44:23 47:17,19,23 48:22, 23 49:12,14,16,18,20 50:2,3 51:24 52:24,25 64:11,12 82:15,19 84:12 90:18,22,24 91:16 93:4 105:13,18 111:4 119:15 120:1,2 200:20	continued 102:6,20 200:13,14
commercial 35:6 191:17	conductor's 205:16	continuing 201:6
companies 14:5 17:23 95:25 202:13	conductors 20:20 21:25 23:14 24:12,20 25:15 33:23 34:14 42:13,18 44:18 63:20 64:9,10 65:11 67:19 68:2,3 75:21, 23 83:20,21 84:12 86:7 89:2 90:15 91:3,4 93:8,9, 10,12 107:4,5 108:15 114:12 117:16 119:5,12, 13,25 156:19 175:18	contract 194:14
company 12:11 17:11 18:14,16 24:13 38:5,12, 13 55:23 56:1 112:22 114:5 153:17 191:13		contractor 10:7,11
compare 72:11		contractors 191:15
comparing 72:18 174:5		contribute 119:17 120:14 195:19
compensated 120:24		contributed 50:14 94:19 117:13 195:9,22
completed 69:20		control 173:1,5
completely 167:10		copper 25:23 35:12 107:3, 5 171:12 203:22 205:9, 13,24 206:5,9
compliant 28:16		
complied 71:22		
comply 174:1 207:24		

cords 148:22**corner** 78:7 80:11 144:8**corona** 84:21,23 85:4
152:7,13,17**Corpus** 71:6 72:17,18,21**correct** 8:5 9:11,12 19:13,
14 26:1,12 30:25 39:23
42:24,25 45:7,18 46:2,21
50:23,24 53:4 55:25 56:6,
11,12 60:15 62:14,17,20
64:6 65:2,7 69:21,22
71:18,19 72:4,24 73:16
75:20 77:3 81:21 84:7,8
91:22 93:24 98:8,9
100:19 105:24 107:13
117:4 118:17,19,25 119:1
122:25 123:11 124:17,22,
25 125:1 128:9,10
129:15,16 130:24,25
131:25 132:17,18 133:11,
12,22,23 134:14,19,20
135:1,2,23 136:3 137:16,
17,25 138:1,12,13,19,20
139:20 140:1,2,4 141:24
143:19 145:4,5,20,21,23,
24 146:8,19 147:1,2,9,13,
14,20 148:2,3,7,8 150:17,
18,21 151:7,9,10,21,22
152:11,12,18,19,24,25
153:3,4,6,7 154:5,9,10,
11,12,22 155:9,10,13,14,
18,21,22 156:25 157:5,6,
16,17 159:7 160:1,2,4,5,8
161:2,13,18,19,21 162:5,
6 163:13,14,19,20
164:17,18 165:6 166:20,
21,24 167:23 168:8,9,11,
16,17 169:6,15,24 170:3,
11,12,14,20,24,25
171:14,15,21 173:20
174:6,7 175:6,7,18,19,22,
23 176:2,14,18,19 177:5,
19,23 178:7,10,14,15,17,
18 179:5,15,17 180:6,20
181:1,2,9,10 182:18
183:6 184:1,2 186:20,21187:4,5,22,23 188:10,11,
16,20 189:6,7,11,12
190:20,24,25 191:9,10,
20,21,25 192:16,17,19
194:10 197:8,9 198:21
199:6,7 200:15 202:6
203:6,7,10,11 204:1,2
205:1 207:15,24 209:17,
22,23 210:16,17**corrected** 130:21**correctly** 67:19 76:19,22
80:5,6,7 81:18 91:8 94:22
108:18 164:9 192:1
198:21,23 199:25 207:5,
12 209:4**corrode** 205:10**corroded** 25:14 44:24
51:21 53:6 54:15 97:10
119:11 170:8 199:20
205:8,9,11**corrodes** 205:25 206:3**corrosion** 47:2 54:15**corrosive** 206:13**coughing** 103:18**could've** 49:6**country** 33:25**county** 70:6,8 71:11 72:2
151:20**couple** 12:7 13:7 23:3
29:14 67:8 104:17,20
112:19 113:6 121:10,17
135:14 139:25 149:13**courses** 183:25**coursing** 91:18**court** 63:24 66:7 77:21**cover** 24:20 109:7 172:18,
25 173:4,12,17 174:9**covered** 172:14,16**covers** 25:22**CPS** 169:11**crack** 119:13**cracked** 157:25 159:10,
14,23**cracking** 68:10**create** 193:24**creates** 193:18**cross-notice** 125:19**CSP** 167:5,7,13,20,22
168:3,10 169:10,13**Cude** 7:16,17 19:16,20,25
21:3 26:16 30:3 59:5 60:9
64:14 68:15 73:20 85:14
86:14 87:6 89:18 106:7
113:8 122:23 125:3
127:12,13,20 129:9
130:17 133:13 138:22
140:11,16 141:23 142:16
145:20 146:23 148:2
158:11 159:3 161:1
168:19 189:10 196:16
201:5**Cude's** 7:13,20 20:4 21:10
23:2,7 29:19,25 30:8,11
32:2,14 40:8 42:20 43:17,
24 44:1 45:1,6,10,13,16
46:4,6,19 49:2,8 50:22
51:11,15 52:1 56:5 57:11,
14,24 58:18 65:5,22 69:6
70:22 73:4,14 75:3 76:10,
12 81:15 82:20 83:3 85:3,
17,18 86:3 87:11 88:24
90:11,14,16 91:2,9 92:8,
15,17 93:10 101:2 102:7,
9 106:5,12 108:19 109:5
110:4,5 113:24 115:15
116:3,20 117:15 118:8,14
126:13 155:24 162:5
163:22 181:8 183:2
197:12 198:19 199:5**current** 13:3 16:19 40:19
42:1 43:7 93:1 99:6 102:5
163:17 177:12,16 178:6,

14,16,20 179:2,5,6,9,16,
22,24 180:2,13,15,19
201:23 204:11,16,18,20

curve 145:1

customer 134:14 167:20
168:7

customer's 150:17 153:9
171:23 186:19 191:24
192:20

customers 111:20 168:5
191:14

cut 10:17 40:9,21 46:14
58:23 65:16 66:1 76:22
88:4 94:1 107:2 114:7
181:19

Cutler 130:23 148:14

cutoff 36:20

cutout 36:24,25 37:16
38:7,18 39:19,25 58:13,
18,21 59:2,16,18,19
60:15,16 62:1,2 66:14
93:18,20 94:5,12 97:15
99:21 167:2 169:6,13,20
196:7,12,13 197:2,7,11,
13

cutouts 37:6,12 58:15,16
59:23 65:14,18,22 66:5

cuts 38:8,9 105:12 137:15

D

D.C. 15:2

damage 107:3,12 114:8,
15 140:12

damaged 142:3 175:25
195:12

dark 120:13

data 158:4

date 6:4 27:22 29:21
30:18 124:19 128:23
147:3 161:14

dates 32:4

day 85:25 86:10,13 87:18
104:4 115:14 134:7
139:24 140:22,25 141:8
142:21 154:17 156:2
160:13 161:24 162:2
182:21

days 52:12 74:3,13 75:4
139:25 142:11,12

de-energized 134:3

dead 36:3

deal 167:13

dealing 42:2

decide 166:8

decided 166:11,17 175:9

deep 29:13

defective 49:19 116:5

Defense 125:14

definition 185:24

degree 14:12,13 184:20

degrees 184:15

delivery 185:21,23 186:2,
14

delta 145:25 146:8

department 12:20 70:20
74:4 87:20 182:1,2

depending 195:11

depends 153:16

depict 82:10

depose 182:4

deposed 188:9

deposition 6:6 7:4,7 8:4,
12,22 9:14 108:6 121:2
122:11,14,22 123:14
124:15 125:19 126:1,2
127:19 184:22 185:2
210:22

describe 69:25 83:17
165:12

describes 79:10

design 202:13

designated 104:17

designed 40:20 42:20
81:14,16 82:21 92:11
93:15 94:1 105:10 138:3
188:3

detail 8:3 112:25

details 77:7

deteriorating 84:22

determine 156:6,21
157:18 165:9 190:19

determined 152:5

devices 138:11

Dew 195:23

diagram 78:8 80:9,10,14
100:1

difference 41:18 53:9,14,
18 96:9 171:10 187:24
188:6 199:10 205:1,4,6
207:1,2,4,6,8

difficult 10:22

diminish 205:13

diminishes 205:15

dip 117:18

diploma 184:16

diplomas 184:25

direct 179:14,23

directed 131:23

directly 41:25 153:9

disagree 108:13

disconnect 90:23 154:7,
19

disconnected 144:18
154:9,10

discovered 139:11 155:3	E	107:9 119:11 137:15
discovery 58:12		162:4 163:21 164:16
discuss 87:22	e-systems 15:4	183:14 201:6
discussed 101:18 117:11 139:11 189:4	earlier 41:14 68:8 70:2 84:13 91:25 93:21 95:10 145:17 164:15 176:15 188:8 200:7	Electronic 187:18
distance 159:16	easier 16:1 27:4	electronics 138:7
distributed 34:22	east 12:4	eliminate 166:3,8
distribution 19:12 33:20 35:18 145:22,25 146:7,11 201:25 202:9 203:5	easy 169:5	eliminated 94:8 181:19
document 125:20 127:11, 16	Eaton 138:2	eliminating 166:19
documents 122:18 125:25 126:7	Eaton's 137:23	embers 74:5
Don 6:12 44:10 121:9 122:6 174:13	Edition 95:21 96:6	employees 202:6 203:8 204:1
Donnie 113:15	education 16:23	enclosure 132:22,24 133:2,20 134:1,18 135:17 152:2 192:15
draw 66:10	effect 119:2,3 205:16	Encroaches 205:20,22
drew 66:12	effects 152:13	end 48:10 60:19 108:10
drive 7:22 8:15,19 57:8 113:17 135:12 168:23 196:4,20	eight-foot 29:6	ended 89:16 113:24
driven 168:19	electric 16:5 18:14,15,16 28:19 29:22 36:10 38:13 55:16 71:25 96:4 109:21, 22 111:23 112:3 131:16 132:2 149:23,24,25 156:19 168:1 173:5 185:19 187:12 188:2 189:1,16 191:13 203:4 208:16 209:9	energetic 194:8,15
drivers 135:12	electrical 10:7,11 11:21, 22 12:11 13:22 14:1,3,15, 22 18:6,11 19:1,2,12 20:15 26:21 29:18,19,24 33:2,4,20 36:17 38:12 55:9,12 57:14 58:6 71:2, 5,6,7,8 72:13 81:15 95:25 106:3,5,12 110:8 111:22 129:1 138:18 173:2 174:9 184:7,8,11,20 185:5 187:7,17 191:16 194:12	energize 192:1
driveway 73:5 76:6 81:19 83:13,15,18 84:7 139:12 155:4 165:16	electrician 12:19,25 19:5, 8 29:17 71:16 199:9	energized 76:11 101:11, 21 108:19 119:25 120:1,3 153:6 155:21 163:2,5 166:5,14
droop 63:22	electricity 84:14,17,20	energy 107:1
drooping 63:12 159:18		engine 101:25
drop 23:25 45:20 46:1,4 62:23,25 63:1 76:2 85:2 117:25 118:2,8		engineer 29:18 185:5,12
drove 123:5 189:9 196:11		engineering 14:2,15 106:3 184:7,8,20
ducking 207:19		engineers 95:25 191:14 202:13
due 100:16		entered 195:13
duly 6:19		entering 138:6
dust 149:9		entire 138:14
		entrance 118:8 132:9 138:4,11
		environments 117:21

equipment 18:19 33:7
35:18,21 51:4,10 57:3,5
72:16,17 97:14 112:5
114:21 116:19 131:11
149:1,7 150:17 173:9
189:17 190:3 191:24
192:21

equipped 18:13,17

era 14:10

establish 30:19

established 120:22
152:17

establishment 27:25 35:6
167:17,18

establishments 37:19
191:17

evening 86:16 88:7

eventually 84:19

everybody's 177:8

evidence 106:1 140:13
166:9,10 175:5 180:23,25
182:12 190:24 208:21
209:1

EXAMINATION 6:20
121:23 193:2 204:7

examples 17:14

exceeds 98:24

excess 177:22

exchanged 188:22

exclusive 173:1,5

excuse 11:14 39:4 44:7
63:11,13 102:24 129:23
136:19 138:4 154:19
159:10

exhibit 12:9,17 19:10
20:24 36:8 44:8,13,14
46:7 47:9,11 48:13 50:18
51:7,8,9,14,18 52:4 56:15
57:5 59:3,25 60:7,23
62:3,4,8,9,22 63:3 64:22,

24 67:16,24 68:18,21
69:13 73:11,12 77:11
78:1,5,12 80:14 81:24
82:4 86:20 96:16,23
97:23 108:22,23 109:3,20
115:18,22 116:17 117:24
125:7,14 126:19 133:8
137:20 139:1,3 143:12,15
145:14 146:15 191:4
196:2,18 199:3 201:25

exhibits 6:2 185:3

existing 152:1 157:24

exists 52:5

expect 203:25 210:4,6,8

expected 142:22 181:4

experience 15:11,22 16:7,
23,24 17:14,15 122:15
181:12 197:16 200:23

expert 19:17 25:10 89:18
104:13 156:6 186:22
187:6,21 188:12 203:13

experts 104:13,17,21
180:2

explain 24:3 25:20 29:10
33:18 35:7,8,23 39:15
41:16 43:11,17 44:3,13
45:9 47:14 48:14,24 64:7
70:17 74:19 80:21,22
86:4 88:16 90:8 92:5 93:3
107:16 113:21,25 117:23
118:7 156:8

explained 114:1

explains 203:16

explanation 83:23 165:12

explode 139:13

exposed 68:2,3

extension 148:22 149:14

external 15:15 177:21

externally 168:15

extreme 91:18

Exxon 15:18

eyeballing 54:1

F

face-to-face 152:10

fact 37:20 71:1 89:3
180:25 200:12 208:20

factories 15:9

factory 25:18

facts 100:21 101:7

fail 110:25

failed 100:18

fair 15:10 27:16 32:6
36:12 80:1 85:11 87:16
95:3 96:19 110:7,18
116:14 158:24

fairly 22:6,8 51:3,9 52:4,
16 58:1 59:24,25 60:11
61:2,19 62:12 63:5 66:20
67:21 68:18 69:9,18,25
73:22 74:9 82:9 85:13
116:11 194:15,22

fall 65:12 111:24 116:23
201:14

fallen 159:14

falling 44:24 68:2 159:24

falls 119:14

familiar 16:16 20:6 30:10,
24 34:4 43:25 50:20,21
110:15,19,21 111:18,20
113:11 165:18 196:3
202:3

fastened 135:11

fault 39:8,10 42:1,10
48:11 50:3,4 66:1 83:12
90:12 106:4 107:10
113:25 131:20 177:6,20,
24 178:4,5,11,13,22

179:7,8,14,20,23 180:7 200:7 201:8,14 209:10 faults 39:11 41:25 94:18 110:2 131:21 160:18 faulty 38:1 feed 17:9,23 feeding 21:25 26:8 28:6, 20 42:5,14 43:21 45:12 49:7 57:24 63:21 81:1 88:4 93:8 99:13 106:19 164:6 168:18 feeds 34:14 36:2 38:24 40:4 90:24 feel 9:18,19,21 feeling 6:25 7:3 103:18 174:18 feet 114:11 117:19 157:15 fell 101:19 102:6 112:4 155:16 fence 42:6 135:12 139:14 fiberglass 38:6 field 13:22 14:22 fighting 182:5 figure 87:23 207:11 filed 127:21,22 finally 89:2 175:21 find 13:12,18 59:1 97:25 110:2 168:21 169:5 fine 6:11 45:22 103:20 110:5 125:16 208:18 finish 174:16 finished 21:13 28:2,15 29:20 30:4 142:5 191:2 fire 9:1,6 22:11 30:18,19, 21,22 31:7 32:2,14,20 38:2,3,10 39:22 49:5 50:15 52:12,18,22 54:7 57:15 58:5,9 65:23 73:1, 15,23 74:4,13 77:2 82:3,	12 84:6 86:16 87:3,14,20, 23 88:7,13 89:19 90:10 91:4,5,13,15,21 92:7,17, 25 93:5,7 94:19,25 97:20 101:22 102:5,11,12 104:24 106:21,25 107:10, 24 108:3,7 109:16 114:14 115:4,10 117:4,13 118:24 119:4,16 120:5,6 139:11, 22 140:14,17 141:12 155:3 156:3,5,6,9,10,21 157:23 160:4,7 161:20 162:15 164:5,13 165:1,9 166:4,16,17 175:10 176:1,4,6,11,16 182:1,2, 5,17,24 183:1 185:16 188:2 190:1,6 193:25 194:4,11 195:1,2,21 196:14,15 197:7,12 200:4,24 201:5 firefighter 185:14 firefighters 106:8 fireman 38:14 firemen 38:4,12 fires 194:12 fit 106:18 fits 24:17,20 five-eighths 29:5,12 39:4 five-eighths-inch 97:8 fix 11:1 21:6 210:6 fixed 94:11 209:18 210:12,13 fixing 181:17 fizzling 194:11 flames 175:11 flat 135:15 flex 144:25 flickering 112:7,18 flip 110:12	flipping 203:1 Florida 12:5 flow 177:4 178:13 179:9, 17 flowing 119:11 162:8 163:18 179:2,23 focus 155:1 folks 133:20 follow 32:13 110:25 191:22 192:25 197:16,17 203:8 204:1 follow-up 121:8 194:3 foot 24:8 29:12 39:5 97:8 111:16 117:18 132:6 198:25 force 160:7,11,13,17 161:7,8,11 forget 46:23 forgotten 187:3 form 89:24 formal 13:23 14:21 found 73:5 94:18 107:3 112:22 142:23,24 foundation 46:11,18 four-hour 12:22 Francisco 18:15 free 9:19,21 188:16,18 Friday 6:3 7:2 friend 112:2 friends 10:16 30:3 112:19 full 6:23 150:11 164:23 fully 28:16 function 59:18 functional 97:5 functioned 100:13 204:25 functioning 81:18
---	---	---

functions 35:25**fuse** 28:9 37:12 40:2

76:17 77:7 78:10 81:2

93:17,20,24 94:6,20

97:15 98:13,14 99:17,21,

22 100:17 102:17 105:5,

20 107:20 166:23 167:1,2

168:11,12,18 169:2,18,20

177:21,22 178:2,7,9,17,

20 180:3,14 190:14 196:7

199:25 200:8,17,21,24,25

fused 36:25 75:19 76:22

77:2 81:10 99:25 100:2

105:11 108:17 201:10

fuses 176:21 179:4**future** 131:5

G

gale 160:7,11,13,17

161:7,8,11

gas 101:21,22 150:3**gasoline** 102:10,11**gauge** 53:10,11,12 54:9,

10 171:9 200:4

gave 165:11**general** 9:8 29:16 55:11

57:13 203:23

generally 30:10 31:25

32:8 34:20 36:12,17

37:14,17 57:25 58:6,8

96:12 202:10,15

generators 18:1**George** 71:7**Georgia** 79:25**GF** 28:3**GFI** 27:23,25 28:4,7,8,10**give** 6:23 7:4 8:11 16:24

17:14 21:7 31:1 38:4

54:22 121:10,16 198:3

giving 7:7 8:22**Goddamn** 207:13**good** 6:15,22 10:1 11:9

12:4 13:1 23:12 29:7,8

54:18,24 95:19 128:5

134:24 150:9,20 157:12

170:8 180:12 183:4

205:16 206:12 207:20

Google 196:25**Gotcha** 96:12**governed** 208:16**governs** 132:2**gradient** 152:10**graduate** 14:7**graduated** 14:11,19**Grand** 103:25 104:3**great** 67:3 122:13**greater** 131:6**greatest** 144:23**green** 28:19 134:24,25

206:1

grid 19:12 58:7**grids** 18:6**grill** 91:15**grills** 149:14 168:6**ground** 23:1 24:8 27:18,

20,23 28:1,14,23,24 29:4,

5,6,7,10,11,12,13,15

36:3,6 38:21,23,24 39:4,

10 40:11,14 41:24,25

42:8,23 43:1,2 44:21

47:24 48:2 49:11,16,17

50:3,9,10 51:19 52:1,5,8,

17 53:2,6 54:14 76:12

79:4 88:25 90:13 91:3

94:13 97:6,7,9,12,15

105:22 111:9,12,15,16

114:1,21 131:14,19,20,

21,22,24 132:3,6,9,12,14

134:25 135:4,5,9,11,15,

16,17 140:7 143:23

146:5,11 162:4,5,10

163:18 170:6,7,8,10,12,

20,23 171:2,23,25

177:19,24 178:4,5,11,13,

22 179:6,8,10,11,19,20

180:7,8 188:25 198:1,10,

21,24 199:4,10 200:3

201:16 203:9,16,21

205:1,5 206:6,14 207:1,5,

12,14

grounded 28:3,4,5,16

39:2 41:14,21 42:5,16

43:4 44:22 47:19,22

48:23 49:14,15,19 50:3

52:23 64:12 82:19 90:18,

21,24 93:8 105:13 114:19

119:15 120:2 131:14

150:22 169:23,25 170:1,2

192:10

grounding 27:18 28:20

41:15,20,22,23 42:16

43:16 47:17 48:22 49:12,

16,18 50:2 52:23,25 91:3

93:8 111:4 132:2 172:1

198:5,12,22 200:20

grounds 28:13 131:21**growth** 67:19**guess** 15:11 45:8,19 69:4,

20 96:21 110:3 114:4

118:3 125:14 141:6

148:23 157:15,25 160:10

190:23 194:19 197:2

guessing 121:9**guidance** 191:14**guide** 109:21 110:16,22

191:19

guidelines 111:1,11

197:16

guy 175:9 182:13 183:9**guys** 31:15 77:18 121:10

125:11 159:5

H		
half 54:2 73:8 75:2,14 92:13,16 93:14 101:10 139:18,20,22 155:11,12	heaters 156:15	hot 27:19,21 36:2 37:24 44:20 91:14,19 119:14 134:22 153:9 179:10,19 180:7 194:14,15
hammer 109:7 130:23 135:13 148:14	heavier 149:5	hotels 15:6 16:13
hand 208:14	helped 94:14 205:2 207:16,17	hots 47:20 48:19
handbook 95:21 208:5,14	Hey 174:13	hotstick 38:6,15 47:18
handle 18:13,16 27:25	high 80:15,25 95:18 152:16 168:15 176:21	hour 123:9 160:9
hands 188:22	higher 53:16,22 177:16	hours 123:25 124:9,15 182:16
hanging 75:14 140:7	highlight 66:6,8 203:12	house 7:13 16:3 20:4,5,9, 15 21:10,13 22:3,23 23:22 26:22 27:7,14 29:19,25 30:14,16 32:21 33:15 40:5,8 42:14 45:13 46:4,6 49:8 50:5 51:11 57:24 62:25 64:15 65:6 70:22 73:4 76:23 81:15, 22 84:4,6 85:17,18 86:3 87:11,25 88:2,5,15,25 89:4,15 90:16 91:2,18,23 92:4,15,17 93:10 94:7 97:16 99:14 101:2,9 105:6,13 107:1,12 108:2, 3 109:5,16 112:8 113:16, 22 114:7,9 115:3,9,15 116:20 117:15 118:14,15 123:3,7 125:3,4 126:13 128:8,11,15,17,18,22,23, 25 129:7,10,12,13,22 130:4,6,10,13 131:3,4,21, 24 134:3 137:24 139:11 140:10 144:10,14,20,23 147:13,24 148:11,25 149:3,7,9,25 151:1 153:24 155:3,7,16,20 156:20,24 163:22,24 164:1,16,21 165:6,15 177:8 181:1,5,6,8,9,18 182:7,18 183:2,10,12,19 194:5 198:19 209:17,22, 24 210:1,5,9
happen 42:15 67:5 89:23 92:11 107:22 123:1 163:8 175:12,25 176:10 179:18 201:9,12,15	highlighted 66:7	household 137:15
happened 40:7 75:6,17 79:23 92:19,23 93:3,16 105:20 108:18 112:13 117:7 122:19 128:13 140:19 165:16 166:9 181:7 201:19,21 207:15	hill 45:16	
happening 88:23 181:6,8	hire 156:5	
happy 67:2	hit 28:8 67:6	
hard 11:12 28:8	hits 40:11	
hard-drawn 171:12	hold 12:1,2 21:5 37:9 50:19 53:15 64:23 77:17 95:15,16 114:11,12,22	
Harvey 31:4,6,7 32:1,17, 20 117:1,7 141:17 161:12	holes 24:18	
hazard 25:15 68:6	home 10:18 13:11,13 49:2 82:20 126:14,15,16 138:4,6,7,15,18 139:16, 20,21 140:1	
head 24:11	homes 15:24	
health 8:5 70:20	honest 7:7	
hear 10:20 104:3,4	hook 15:19 153:24	
heard 151:16	hooked 14:24 16:9,10,11, 12 27:9,10,11 33:7,9,11 80:5,6 148:20 149:10,12, 18	
hearing 11:12 122:12	hooking 17:1,15 192:9	
heat 102:4,5 193:19,24	hooks 24:13	
heated 91:10 108:3	hookups 15:15	
heater 30:13 33:15 162:25	horsepower 15:19	
	hose 84:15	
	hospital 16:1	
	hospitals 14:24 16:12 17:17,25	

houses 17:1 58:15**housing** 38:25**Houston** 167:18**hundred** 114:11**hundred-amp** 131:7**Huntsville** 14:25**hurricane** 31:3,4,6,7,13

32:1,17,19 117:1,7

141:17 142:3 161:12

HVB 80:15

I

idea 25:8 69:3 73:9 75:18

87:6 158:7 160:12,22

163:17 182:15 209:19

ideas 195:5**identified** 199:4**identify** 44:8**ignited** 156:17 163:11**illustration** 36:8 43:12,18**illustrative** 193:17**image** 196:25**imagine** 26:25 30:3**impedance** 163:12**important** 35:17,20,22

36:18 37:16 38:19 39:6

41:2 48:7 53:3 120:21

199:24

impression 159:13**inadequate** 54:11,12**inches** 24:9 29:14 135:14**incident** 8:25 22:12 49:5

50:14 52:7,9 54:7 58:18

72:14 85:20 97:2

including 12:5**inconsistent** 111:10**incorrect** 110:9 170:5

173:18,25 190:24

incorrectly 170:1**incredible** 193:18**Indicating** 95:17**individual** 59:19 92:3

140:20

industrial 167:18**industry** 16:17 185:25

197:17,22 198:7 202:18

203:23

information 79:13 80:3

124:18 137:23 164:19

informational 191:12**inserted** 133:1 135:22**inside** 35:12 36:25 50:8

91:10 106:12 107:4,5

114:10 130:10,18 135:25

137:4,8 147:13 149:3,7,8

152:5 156:18,24 167:1

169:19 188:2 194:5,21

206:25 210:4

inspect 22:15,21 26:21

27:12 71:11,18 140:10

150:16,24 151:1,4,5

192:2,9,13,14,15,20

inspected 71:3 82:12

147:13 150:12 151:9,23

152:1 199:14

inspecting 71:1 139:10

155:2

inspection 70:25**inspections** 70:18,19**inspector** 71:5 151:20**inspectors** 71:7,8**install** 28:11,12,23 29:13

128:18 131:1 132:14,20

135:7 148:18 164:8

191:25

installation 17:2 22:10

28:25 69:21 71:12,17,23

92:1 107:18,19 110:9,22

111:1,10 117:12 118:23

119:11 138:10 171:19,22

173:13,17 198:18,19

203:5,9,16

installations 18:4 56:10

106:3 109:22 110:8

111:22 173:1,2,4 174:9

189:5 191:16,24

installed 15:2 28:14 70:21

71:4 100:25 109:4 114:22

116:20,24 117:25 130:23

132:7,10,21 133:17

134:18 135:4,5 136:20,23

137:25 138:12 142:7,11,

12 143:16 148:14 149:15,

17 150:13 152:23 154:1,2

163:23 168:3,5,7 173:21,

22 174:2 196:13 197:6,7

198:22 199:25 207:5,12

installers 202:13**installing** 116:22 135:3

159:6 192:8

instance 40:11,13 50:4

78:11 181:14

instances 112:1,6,17

113:5

instant 40:16**instill** 132:23**instruments** 105:9**insulated** 64:10**insulation** 25:14,19,21,22

26:2,10 44:24 68:1,8

83:20,21 84:13,22 85:8

91:5,12,15,20,21 92:18

108:15 119:14,24 156:11

157:7 159:10,15,24

175:15,17 176:12

insulator 80:25

Intelligible 46:13 intended 131:9 intent 138:17 interested 16:22 191:15 internal 15:14 40:2 81:2,3 85:7 106:4 168:10,12 169:13 internally 99:25 100:2,3 190:13 International 12:10 14:2 Internet 36:11 197:1 interruption 129:25 intersection 196:3 interview 85:23 interviews 106:1 120:4 introduction 172:9 191:12 investigating 73:3 investigation 51:19 58:14 73:1 82:2 85:23 89:6,11 95:22 96:3 109:24 113:21 115:19 investigations 185:17 involved 162:23 issue 28:9 106:12 111:8,9 issued 191:13 issues 27:16 29:24 47:2 item 39:6 50:11	137:19 138:25 143:11 144:4 145:13 146:14 147:7 150:6,7 154:23 157:11 jump 93:2 jumper 47:23 48:5,6 jurisdiction 173:15 187:14 jury 9:4 15:13 21:21 24:4, 14 25:20 33:19 35:8 37:3 41:17 43:11,18 44:4 45:9 47:14 48:14,24 51:25 53:15 62:24 64:7 66:4 68:8 70:17 73:2 74:20 78:19 80:22 88:16 90:9 93:3 95:16 104:3 107:17 109:3 113:22 117:22 118:7 133:20 193:17 194:25 198:2 199:16	<hr/> L <hr/> labeled 56:15 77:11 81:24 86:20 109:20 115:18 196:1 Lagardo 189:18 landed 139:13 Lane 20:6 39:21 45:2 50:23 51:16 56:3 64:15 69:7 73:15 86:15 laptop 103:5 large 139:14 law 191:18 208:8,15 lawn 155:4 lawsuit 127:21,25 lay 136:24 laying 83:13 139:12 141:1 155:4,11,12 layman's 15:12 leaks 84:16,17,19 learn 198:16 leave 32:10 led 119:4 left 46:8,12,17,19 75:4,5 76:9,13 82:8 83:21 89:8 92:22 107:7 118:10,12,16 155:6 157:20 164:14 165:14 leg 10:17 Legalview 6:7 legs 134:22 length 175:3 level 29:15 138:6 levels 11:7 license 12:1,3,4,20,21 13:4 14:1 18:8 19:1,2,5,9 184:4
<hr/> J <hr/> Jim 70:6,8 71:8 job 10:1 163:24 164:4 John 7:15 44:7 86:12,13 Johnny 87:18 joins 206:15 Jonathan 125:6,22 126:19 127:2 128:3 133:8 136:13	<hr/> K <hr/> kidding 104:2 kids 88:19 kill 177:17 kiln 149:16,19,23 kind 18:25 24:16 25:17 27:25 28:22 30:11 39:10 41:24 42:2,21 50:3 61:8 64:3 67:19 72:8 74:21 82:24 83:8 99:15 127:8 137:12 162:7,17 189:24 King 113:15 kink 97:11 199:2,19 205:13,18 kinked 205:11,12 knew 30:15 130:3,4 143:4 186:18 208:19 knowledge 16:25 106:2 121:4 122:15 200:22	

licking 175:11	116:2 136:8	18,22 80:24 92:2 106:18
light 183:16	location 132:17 138:5	109:7,8 130:23 135:24
lighten 81:15	168:23	136:4 137:13,14 162:10,11
lightning 36:19,23 38:17 40:10 168:14	long 8:16 9:8,9 10:8 19:20 31:7 32:1 52:11 123:24 143:9 158:3 183:11,13,18 193:7 194:18 202:22	maintain 11:20,25 18:6 57:3 72:16,17 190:3
lights 27:6 112:7,18	longer 10:10 95:5 140:1 193:5,6	maintained 13:3 72:23 90:7 97:5,14 102:16 200:1 209:18
limits 141:13	looked 22:13 29:21 47:1 51:21 54:9 56:9 73:4 78:25 79:1 86:24,25 93:20,21 95:11 97:10 106:2 126:22 133:11 145:17 154:8 159:5 164:19 165:19 166:10 182:12 196:10 199:1 202:11	maintaining 55:12 56:2 100:11 111:5 112:5
lineman 18:5 37:23 96:23 198:16 208:2	loop 117:18 135:21 159:17	maintains 55:22,23
lineman's 95:12,20 202:15 208:4,14	loose 38:7 88:4 112:9,23 114:7 118:1	maintenance 16:15 17:2 56:10 89:25 100:12,16 110:10,11 111:7 197:21
linemen's 198:14,20	lost 112:3	make 17:9 44:8 67:5 70:7 77:19 119:13 136:22 150:19,22 159:22 161:15 179:20 180:1,12,21 185:2 207:2
linemens 198:5	lot 16:1 17:13,25 18:11 57:8 93:21 149:22 179:16,22 207:16,17	makes 14:20 124:21 146:7 158:9 177:22
lines 55:22,24 56:2 60:2 67:20,22 88:4 90:17,18 116:1 118:4,13,16,19,21 119:3 153:10,15,24 154:7 168:20 176:22 189:17 195:23	Louisiana 13:2	making 170:8 183:12 206:12
list 16:13 125:25 126:3,9	lunch 77:16	malfunction 181:3 209:8
listed 126:9 158:19	lunchtime 103:7,10	malfunctioned 164:11 175:4 180:24 209:5
listen 209:20	lying 149:9	malfunctioning 200:25 210:3
lit 175:11		malfunctions 50:7,8
litigation 202:23		Mandatory 172:20
live 8:14 56:7 70:3,6 86:13 102:6 151:20 158:7 200:14 201:13	Madam 63:24 66:7 77:21	manual 110:4 171:20,22 191:6,9 202:1,15,16,21 203:8
lived 8:16 9:9 19:25 111:18 124:24 129:3 130:14	made 40:18 79:25 104:23 109:11,14 134:8 205:1,4, 6,9 207:1,3,6,8	manuals 202:9
living 129:7 130:15 209:23 210:1	magnitude 176:15	manufactured 79:18,19, 21
load 149:4	main 20:18 21:17,23,24 23:13 28:5,14 34:25 35:1 40:12,15 42:7 49:6 65:17,	marked 12:9 20:24 36:8 73:10
loaded 23:1		
locate 85:16		
located 7:11 8:19 9:5 20:5 46:20 51:15 57:7 62:15 65:3 67:14 78:19 113:16		

M

marker 31:1	mention 23:19	misspoke 204:19
marks 17:6	mentioned 13:7 23:20 28:12 41:2,14 47:1 53:5 54:15 70:2 77:4,5	mistaken 117:11 118:24
Martin 6:8,18,24	mess 129:2	mix 102:11
mass 15:3	met 209:1	Mohawk 8:15,19
master 12:25 19:1,2,5,8 29:17 71:16 199:9	metal 82:24 83:8 101:24 149:9 206:4,9,13	moisture 195:16
master's 12:1,2,19 14:1, 13,14 184:3,6,8,11	meter 17:9 20:9,16,20,21 22:1 24:6,10,22 26:5,8 28:20 29:2 47:18 88:1 90:19 91:1 106:19 109:22 114:6 132:8,22,23 133:1, 2,5,20,21,25 134:1,10,11, 18 135:6,10,17,21 136:18,24 137:7 150:13, 20,21 151:3,6,12 152:1,2, 21,23 154:1,3,4,7,11,12, 16 156:14 162:14 163:22 164:25 171:19,22 181:18 182:6,17 186:12 191:5,6, 8,19,23 192:18,22	moment 13:10 40:17 125:8 149:12 160:16 192:24 210:2
material 148:9 158:19 172:21	meters 90:19 192:9,15	Monday 8:9
materials 95:8	methodology 165:8	money 148:10 188:22
matter 7:16 134:6	Meyer 87:19	month 32:22,23 123:2 124:8
maximum 152:9 193:9	Meyers 182:3,4	months 31:14,25 32:7,9 141:12 157:22 160:3,17 161:13 185:7
Mcgill 113:2	middle 24:10 44:22 48:20 64:4 75:3 105:16	morning 6:22,25 7:4,8,12, 17 8:4,9,12,22 88:11 114:4 161:21,24 166:16
means 70:17 80:15 105:5 109:8 157:7 178:5	mile 9:7 57:12 59:14 69:8 168:25 169:20	motels 15:6 16:13
meant 204:17	miles 34:11	motors 15:19
meantime 88:3 92:16 93:11	mind 54:21 56:14 104:8 121:6	mounted 23:2 168:15
mechanically 141:13	mine 10:16 112:2,19	move 11:4 48:17 67:9
meet 19:22 208:22 209:1	minute 119:7,8 126:4 128:14 129:24 167:5 169:17	moved 108:2 149:22
meeting 77:16	minutes 54:23,25 55:1 121:10,17 123:7	
melt 102:22 176:12 200:13	missing 62:2 73:8 75:6,15	
melted 73:5 75:21 76:8,9, 11,15,25 81:19 82:3,8 83:9,20,24 84:3 89:2,20 92:22 101:9,10,14,15,19, 20,23,25 102:1,9 106:21 108:16 139:11 155:3,6,9, 16 156:14 164:7 165:3, 15,17 176:5 200:13		
melting 92:15		
melts 175:21		
member 12:14		
memorized 187:1		
memory 127:8		

N

nameplate 40:2 41:5
76:18 77:6 80:9 100:2,4
166:25

names 112:24

Nashville 18:13,14

nation 187:13

National 16:5 28:18 29:22
71:25 96:4 131:16 132:1
187:7,12,17 188:2 189:1
208:16 209:9

nationwide 95:24 198:6
208:10,13,14

<p>natural 150:3</p> <p>nature 17:3 189:23</p> <p>NE 197:15</p> <p>nearest 162:4</p> <p>NEC 18:16 29:22 71:25 98:3,7,10 132:1 165:25 172:1,3,4 173:4,8,10,16, 22 174:1,5,8 186:23 187:25 188:6 189:20 197:15 207:22,24 208:9, 11,12,13</p> <p>necessitate 131:6</p> <p>needed 130:19,20 148:17, 24</p> <p>negligence 89:24 90:3,5</p> <p>neighbor 85:25 86:13 113:9,14 114:2 181:17 182:20</p> <p>neighbor's 86:3,9 87:25 113:13,22 114:7 115:3,9 118:15 181:5,6,8,18 182:6,18,20,21 183:12,19 209:17,22 210:4,9</p> <p>neighborhood 19:23 55:10,11 61:17 93:23</p> <p>neighbors 101:13 181:16 183:10</p> <p>NESC 187:7,25 188:6 208:17,23 209:2</p> <p>network 203:5</p> <p>neutral 22:1 27:20,21 35:14 39:1 41:21 43:3,10, 15 44:22 47:22 48:23,24 49:12 90:21 105:16 119:15 156:15 163:3 170:3,14,17,19 179:14</p> <p>neutrals 194:14</p> <p>newspaper 91:14</p> <p>NFPA 165:18 166:1</p>	<p>night 87:3 88:12 114:3 120:5,13 160:4,6,23,25 162:20 195:5,7,8,22</p> <p>nipple 26:6 91:1</p> <p>no-nee 23:3</p> <p>nominal 145:3</p> <p>noninsulated 64:11</p> <p>notarized 127:5</p> <p>notes 121:8 191:1</p> <p>notice 142:13 203:14</p> <p>noticed 92:1,3</p> <p>November 30:23 114:3</p> <p>nowadays 27:19</p> <p>nude 109:7</p> <p>number 20:1 23:1,11 28:24 29:3 38:24 53:8,9, 10,11,12,24 54:2,10 64:23 79:17 111:13,14, 15,19 125:7 143:20 145:14 146:15 171:7,8,9, 17 172:2,19,24 198:24 199:2,17 203:22 205:16, 17</p> <p>numbers 79:17</p> <p>numerous 14:4,23 15:24 16:9 20:13</p> <p>nurse 8:8 130:1</p> <hr/> <p style="text-align: center;">O</p> <hr/> <p>Oak 70:6 151:20</p> <p>observation 41:10</p> <p>observations 60:17</p> <p>observe 65:8,9 78:15 83:11 88:12 101:14 107:5 114:24</p> <p>observed 41:8 52:8 54:7 60:2,3,12 61:3,20 62:12 63:6 66:21 67:22 68:19</p>	<p>69:11 74:16 75:11,12 76:5,6,7 79:1,7 82:10 83:14,18 84:23,25 85:1,3, 14 86:2,4,18,22,23 90:2 97:17 100:22 101:13 102:1 120:5,6,7,8,17 139:15 201:4,5</p> <p>observing 166:16</p> <p>obtain 79:14</p> <p>occasion 30:7</p> <p>occasionally 40:14</p> <p>occasions 153:11</p> <p>occur 112:12 152:13 163:2 181:5</p> <p>occurred 9:2 30:22 31:8 32:2,15,20 39:22 41:11 90:5,6 97:21 113:5 115:13 118:25 161:17 176:11 194:8,20,21 200:18,19</p> <p>occurs 180:10</p> <p>October 6:4 127:5,16</p> <p>offhand 7:21 20:12 25:6 32:3 98:2 151:18</p> <p>official 71:4</p> <p>Oklahoma 13:1</p> <p>One's 118:14</p> <p>one-ought 22:2</p> <p>open 26:25 37:12,25 176:21,25 177:17 178:2, 4,9,11,12,20 179:5,11,20 180:3,6,8 201:22 204:10, 21</p> <p>opened 200:21 201:17</p> <p>opens 178:16 180:14</p> <p>operating 102:16 203:3</p> <p>opinion 29:16 49:3 50:15 54:11 72:12 80:4 88:23 89:12,17,18 94:4,5 97:20</p>
--	--	---

99:1 100:15 104:24
105:18 107:23 118:20
175:3 197:20

Opry 103:25 104:4

organization 12:15

oriented 133:19

origin 104:23 156:6

originate 107:24

originated 75:2 87:23
107:1,10 108:1,8

originates 33:21,22

originating 186:10

outlets 28:3

overstretching 119:3

P

p.m. 103:12,13,14 121:19,
20,21 174:21,23,24
210:20,22

pad 46:18

pages 202:22

paid 196:11

panel 17:4 20:16,17,19,22
21:10 23:11,13,15 33:24
40:20 42:20 50:8 57:17
92:10 93:12 112:21 129:1
130:19,20,23 131:13
132:2,16 133:14 136:1,5,
9 137:5,9 138:11 140:17,
23 141:1,7 148:14 152:1
156:17,18,22 162:14
163:18,23 164:6,24 165:1

paper 126:6 127:4

paragraph 139:10 147:11
150:12 155:2 157:14
160:15,16

Pardon 10:14

parking 175:5

part 29:9 49:4,6 51:18
53:2 82:1 83:7 85:22 89:5
95:23 109:23 114:9
115:19 140:5 141:4
145:22 155:17 161:8
173:4 174:16 188:1
191:18

parties 90:3 191:15

parts 38:19

party 175:9

pass 18:10,12

passed 113:2

past 186:19

Pat 113:2

path 182:23

patience 67:10

patina 206:1

Patricio 189:16

Pavalec 189:19

pay 148:9

people 85:23,24 106:8
110:1 130:15 133:21
154:18 191:9,20 192:8
193:13

percent 98:14

perform 35:25

period 31:25 32:7,9,19
84:15 119:13

periodically 97:5

permission 153:17,18

permissive 172:20

permit 70:23 71:14

person 71:17

personal 8:4

personally 86:23 102:1
104:15 126:11,12

ph 23:3 106:25 189:19

phase 163:2

phases 163:6 164:22,23,
24

phone 129:25 134:8
153:23

photo 133:13 135:18
139:1 143:12 145:19

photograph 22:7 51:1,2
52:4,15 59:25 60:18
115:19 145:17

photographs 159:3,4,12
189:9,22 190:5

photos 122:24 141:23
155:24 159:25 189:10

picked 85:19

pickup 201:15

picture 20:25 25:25 26:16
34:19 43:16,24 44:5 46:6,
17,23 47:10,12 48:16
56:16,19,23,25 59:1,5,10,
12,15 60:24 61:6,16 63:2
64:4 65:9 68:16 73:17,19,
21 74:2,7 78:1,24 81:24
86:19,24,25 87:5,7,8,13,
15 91:25 115:23 116:8,13
118:10,11,13,17 133:18
136:21

pictures 26:14 55:8 56:17,
18 59:4,7 60:8 64:25
67:11 68:22 73:18
206:19,20

piece 29:3 35:18,20 48:7
57:5 91:13 116:19 135:10
139:17 168:8

pieces 48:9

piling 146:4

pipe 24:18 42:12 89:14

pipelines 15:19

place 14:25 89:1 90:23

<p>176:6</p> <p>places 24:9</p> <p>plain 159:2</p> <p>plaintiff 7:16 19:15</p> <p>planning 191:15</p> <p>plans 131:5</p> <p>plant 33:22 34:21</p> <p>plants 14:24 15:5,8</p> <p>plastic 26:10 91:20</p> <p>plate 77:5 78:8,12,19,22 79:8,10,14 190:9,11</p> <p>plates 79:15</p> <p>play 49:3,4 63:10 117:20</p> <p>played 103:25</p> <p>plug 23:4 148:21 149:14 150:21</p> <p>plug-in 156:15</p> <p>plugged 151:11 165:2</p> <p>plugs 164:22</p> <p>point 102:19 104:7 138:3 159:13 169:15 185:21,23, 25 186:2,13</p> <p>pointed 153:13</p> <p>poke 24:18</p> <p>polar 16:19</p> <p>pole 25:2 28:1 36:10,13, 18 37:4,17 38:19 39:2,5 42:24 43:15 44:1 45:12, 15,21,24,25 46:8 47:25 49:1,7 51:2,20 52:1 53:23 54:6 60:5 63:12,16,21 65:12,15 69:2,10 76:3 78:15 94:13 105:22 111:17 114:9,12,17,19,25 115:24 116:2,12,20,22,25 117:12,16 118:5 140:4,6 141:11,16 142:6,7,11 143:5 155:12,18,19 157:24 158:6,10,12,17</p>	<p>159:6 170:10,12,14,24 177:10 182:19 188:25 197:5 209:14</p> <p>poles 38:22 61:10 93:22 111:23 112:4 114:13</p> <p>poor 100:16 110:10,11</p> <p>pop 20:23 56:14</p> <p>position 208:1</p> <p>post 74:21 135:12</p> <p>potential 119:3</p> <p>power 14:24 17:10,23 24:13 27:24 28:6 33:22 34:21,23 36:10,13,17 37:4,17 38:5,8,9,19,22 40:18,21 42:7 43:15 45:15 49:7 50:11 58:23 60:2 63:21 64:10 65:16 66:2 67:22 69:4,10,14,19 70:22 76:22 77:8 80:24 81:7,11 82:7 84:18 85:7 89:14 91:8,25 93:21,22 95:25 107:20 109:7,21 112:4,22 114:5,9,12,13, 17,18,25 116:12,20,22,25 117:12 131:23 153:17 162:12,14 177:17 186:10 191:13 202:13 203:4</p> <p>practice 198:8</p> <p>practices 197:18,22</p> <p>preamble 203:2</p> <p>precaution 102:14</p> <p>premarked 6:2</p> <p>prepare 121:2 122:11</p> <p>prepared 127:11</p> <p>present 58:2 152:6</p> <p>pretty 23:18 27:11 29:15 38:20 54:4 83:19 95:18 120:22 123:23 124:13 160:1 161:5 162:11 169:5 186:24 194:8 195:3 198:4 199:11 202:17 203:24</p>	<p>prevent 7:6</p> <p>previously 46:20 123:15</p> <p>primarily 18:3</p> <p>primary 16:20 34:15 35:12 36:1 39:14 42:6 98:11,12,18,21 200:23</p> <p>principle 84:14</p> <p>printout 169:7</p> <p>prints 16:3</p> <p>prior 19:16 30:18 45:2 46:20 128:13 129:5 141:12 161:13</p> <p>private 168:8</p> <p>problem 37:13 53:7 94:9, 11 100:15 139:7 142:23, 24 160:3 181:13,16,17,20 207:13,18,19 210:7,13</p> <p>problems 9:17 25:17 54:13 111:21 181:5 199:18</p> <p>proceed 6:16</p> <p>produced 104:13 158:16 202:23</p> <p>products 138:3</p> <p>professional 94:5 185:11</p> <p>program 109:25</p> <p>projected 131:4</p> <p>projects 14:23</p> <p>promised 188:21</p> <p>pronounce 63:25</p> <p>propane 150:3</p> <p>proper 94:13 97:6,12,15 200:4</p> <p>properly 77:1 97:14 100:14 102:16 174:2 192:10 200:1,17 201:10 206:25</p>
---	--	--

<p>property 114:10 168:8</p> <p>protect 35:24 98:11 138:18 164:20 165:5</p> <p>protected 33:12 49:20 93:18 94:7 169:6,12,18</p> <p>protecting 23:14 37:22,23</p> <p>protection 16:20 98:12, 19,21 99:6,10,11,15 138:3,5,14</p> <p>protector 21:18 36:23 92:2 135:22,25 136:2,7,8, 23 137:11 148:2 163:24 164:4,8,20 165:5</p> <p>protectors 137:24</p> <p>protruding 152:6</p> <p>prove 171:5</p> <p>provide 13:16 111:25 112:24 138:3,14 184:21</p> <p>provided 12:6 21:3 78:18 182:13</p> <p>provider 55:18,21,22</p> <p>providers 55:20</p> <p>provision 37:20 99:9 150:2</p> <p>provisions 96:13 100:6</p> <p>public 191:20</p> <p>puddle 82:24 83:8</p> <p>pull 36:7 38:7 42:22 43:12 50:17 73:10 86:19 96:15 108:22 125:7 146:14 154:3 182:17 195:25 198:1</p> <p>pulled 44:5 47:11 62:22 68:21 77:10 81:23 88:1 90:19 109:20 114:6 115:17 116:16 117:17,20 134:6,8,10 154:4,7 181:18 196:17 197:1 199:3 201:24 202:22</p>	<p>pulling 182:6</p> <p>purchased 128:8,11,15, 17 130:6</p> <p>purpose 127:17 131:18</p> <p>put 8:9 12:7 15:12 17:4,5, 6,7 19:10 20:17,19 24:11 25:16 51:8 91:14 131:9 132:16 133:25 134:7 138:22 148:1 192:18</p> <p>putting 74:5 138:17</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualify 19:11</p> <p>question 40:24 46:15 51:9 58:11 113:19 148:23 160:10 162:16 166:7 171:11 175:8 187:16 189:25 190:5,23 191:3 195:6,15,16 197:25 209:20</p> <p>questioning 54:22 195:25</p> <p>questions 9:18 104:9,21 121:8,9 122:8 123:21</p> <p>quick 7:11 21:21 31:16 48:14 54:21 66:20 67:6 69:13 72:7 74:14 77:19 103:3 115:17 121:5 174:14 204:9</p> <p>quickly 50:17 103:5</p> <p>quits 103:10</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>radius 59:14 69:8</p> <p>rain 120:14 195:17</p> <p>raised 84:21</p> <p>ran 156:20</p> <p>rapidly 194:22,23</p> <p>rated 179:5</p>	<p>re- 127:8</p> <p>re-putting 142:6</p> <p>reaction 194:8,16,19</p> <p>read 25:9 37:5,6,11 106:24 161:4 172:19 173:19,20 191:11 203:19</p> <p>readings 96:1</p> <p>ready 6:13 7:4 121:25 124:15 174:19</p> <p>real 7:11 21:21 31:16 46:22 48:14 50:17 66:20 67:6 69:13 72:7 74:14 77:19 103:24 115:16 199:13 204:9</p> <p>reason 8:2,3 22:17 78:21 127:15 159:23 200:2</p> <p>reasons 8:5 115:2</p> <p>recall 20:12 31:24 59:12 146:20 153:22 185:10 196:6,8</p> <p>recently 56:8 68:16 69:24 165:19 196:14</p> <p>receptacle 28:7</p> <p>receptacles 22:25 23:4 27:5,13,17,19 28:6,8,10 147:17 148:21,25 149:13</p> <p>recognize 108:23 199:10</p> <p>recollection 127:23</p> <p>reconnect 154:20</p> <p>reconnecting 153:1</p> <p>record 6:5,10,23 7:11,14 11:15,18 31:16,20,23 55:3,6 103:12,15,17 104:2 121:14,17,19,22 174:22,25 210:21</p> <p>records 158:15</p> <p>red 136:3</p> <p>Redstone 15:1</p>
---	---	--

reduce 35:5,16 138:5	Renee 112:2	require 110:20 171:18 198:6
reduced 34:24	renew 12:21	required 16:18 29:13 53:21,22 111:13 132:5
reduces 35:10,13 36:4	repaired 210:16	requirement 71:10,14
referenced 63:24 82:22 98:1 101:14	repeat 36:21 63:13	requirements 16:16 110:21 173:11 174:5 187:13 189:1 208:23 209:1,8
referred 55:18	replace 22:21 23:25 24:24 25:11 117:15 130:19 147:17,23 148:4 158:10, 12	requires 37:21 53:10 171:8,16
referring 39:21 68:13	replaced 21:16,17 23:23, 24 25:15 27:5,6 60:5,6,20 61:7 68:4 85:2,7 100:24 115:8 119:6,9 141:12,16 142:1 147:15,16 152:20 157:22 158:10,11,21	research 109:24
refineries 15:8	replacement 143:5 158:16	residence 7:20 20:7 27:24 28:13,16 30:8 32:2,14 35:6,24 37:18 38:3,9,10 39:21 43:25 44:1 45:2,3, 6,10,17 46:20 49:21 50:22 51:15,16 53:11 56:5 57:11,15 58:19,23 59:19 63:21 65:23 69:7 73:15,23 74:11 75:3 76:3 85:3 90:12,14 91:9 92:8 93:18 106:13 116:3 118:9 186:1,12 193:10 199:6
refresh 127:8	replacing 141:20 142:6 147:21 157:23	residences 106:5 181:11
refresher 12:22	report 25:10 41:1 98:1 106:25 117:10 126:23 130:22 146:13,19 158:25 160:21 166:22	residential 15:7,21,22 17:17 34:15 36:13 39:12 55:11 185:22 191:16
regard 16:14,23 197:21, 25 198:18	reporter 6:6,9,17 10:14, 22,24 11:9 36:21 37:1 46:14 63:13,17,24 66:7,9, 24 67:3,7 77:21,23 78:3 119:7 125:16	residents 111:14,20
registered 185:11	reports 104:13,18	resolved 112:16
regular 169:9 177:8	represent 7:14 21:2 36:10 52:5,17 59:25 60:12 61:2, 19 62:12 66:21 68:19 69:10,18 73:22 85:13 122:7 196:25	responses 58:13
regulations 12:21 72:3	representation 36:12 96:20 116:14	responsible 55:12 56:1,2 71:1
reimbursed 148:12	represents 22:7,9 51:3,10 58:1 63:6 67:22 74:10 116:12	rest 22:2,22 155:20
reinstalled 154:16	request 138:22 148:2 184:24	restaurants 15:7
relate 42:15	requested 138:23	result 176:1
related 14:22 18:3,5 33:3		retire 10:8
relates 33:2		retired 10:4,6,12 11:20
relating 16:17		return 42:21 43:5 50:2
relation 24:5		
relevant 18:24		
relied 95:22 96:3,24		
rely 95:9		
remaining 29:23		
remember 13:5 20:11 30:18,22 31:2,7,12,13 32:15 58:12 65:3 67:13 98:2 108:24 109:13 113:4 115:12 126:24 127:2,10 133:10 140:24 145:16 190:9 191:4,6 193:11		
remind 122:18		
remotely 6:7		
removed 133:3,5		

reuse 132:23 review 104:12,18 110:13 115:19 reviewed 82:1 109:23 115:21 126:3 202:24 reviewing 123:20 Ricardo 104:22 right-hand 78:7 133:22 rim 60:5 rim s 101:23 riser 17:10 24:12 132:20 road 86:14 robotics 14:25 rock 111:24 rod 29:5,6,8,10,11,12 38:23 39:4 41:24 43:1 49:17 97:6,7,8,9,15 111:16 131:14,19 132:3, 5,6,9,14 135:4,5,11,17 162:5 rode 122:23 rods 198:24 203:17 roll 6:13 rolled 144:13 Romex 148:5 Ron 87:19,21,22 88:6 182:3,4 room 15:2 rotten 60:6 65:11,12 112:5 116:23 142:2 routine 185:7 rubble 141:5 rule 9:24 rules 72:2 172:20 191:22 run 14:23 84:15 running 25:12	runs 27:6 170:24 rural 69:25 70:1 72:9,15 151:21 rust 100:24 205:24 206:23 rusted 60:4,19 61:8,24 100:18 189:23 200:2 205:23 206:13 <hr/> <p style="text-align: center;">S</p> <hr/> safety 102:14 187:7,17,19 208:16 209:9 sag 159:20 sagging 117:19 San 18:15 189:16,19 Sandia 7:23 8:15 70:3,4,8, 9 sanding 131:12 Sandy 10:20 125:13 Sarry 113:1 satisfied 100:6 save 67:6 163:24 182:17 saved 115:5 scene 74:11 140:14,17 166:16 182:14,15,16 scenery 148:19 Schauer 6:11,13 9:21 13:17 31:18 44:7 54:25 103:6,9 121:24 122:6 125:6,9,12,17,18 126:18 128:3 133:7,10 136:13,15 137:19,22 138:25 139:4,8 143:11,14 144:4,7 145:13,16 146:14,18 147:7,11 150:6,10 154:23 155:1 157:10,13 174:15, 20 175:1 193:8 194:3 195:4 197:14 204:8 210:18	school 13:23 14:7 schools 16:12 scientific 104:23 scoot 11:4 scope 172:12 scorching 114:25 scraped 24:9 screen 12:7 19:10 20:23 25:24 44:5 47:11 56:15 69:15 73:11 77:10,15 83:3,4 96:17 108:25 115:17 160:16 196:1,18 199:3 201:24 scroll 37:10 125:22 127:3 136:13 144:4 147:8 150:6 154:24 157:10 202:25 secondary 16:21 40:3,4 42:8 44:19 47:8 77:9 80:20 99:6,10,11,12 116:1 168:13 170:19 190:14,15 section 37:13 132:1 187:3 seeped 165:2 select 52:24 self-protected 39:16,17 40:24 41:3 167:11 selling 149:22 send 66:25 sending 156:19 sense 14:20 70:7 sentence 148:13 151:25 separate 43:2 separated 107:2 108:10 separates 175:22 serial 79:17 serve 189:13 201:6 served 208:1
--	--	--

server 82:15	111:6	sizzled 195:1
service 17:1,2,4,5,15,22 18:4 20:8 23:21 25:2,12 26:9 40:11 45:19,20,21, 23,25 46:1,4 55:18 57:13, 14 60:21 61:13 62:19,23, 25 63:1 70:22 76:2 81:15 85:2 109:22 110:20 111:14 112:3 117:24 118:2,8 128:18,20 129:2 132:9 135:14 138:11 140:4,6 141:11,16 145:9 151:2 155:18 171:8 178:25 185:22,25 192:9, 10 193:10	sic 81:16 144:12	skimmed 161:9
serviced 112:14	side 16:20,21 18:4 34:16 35:11,12 36:1,4 39:11,12, 14 40:3,4 42:6,8 44:19 46:17 47:8,18,24 77:8,9 80:17,19,20 90:20,21 94:6 98:14 118:16 133:22 168:12,13,15 181:15 190:14,15	skyscrapers 15:6
servicing 57:14	sides 24:19 47:20 98:14	sledge 135:13
serving 209:16,21	sign 161:2	slow 194:11
set 16:4 70:7 114:12 158:5	signed 126:6 127:4,9,16 147:1,4 160:21 161:4	slowly 195:1
settings 190:16,20,24	significance 76:14	small 54:15 111:12 191:17 199:1
setup 70:5 146:10	significant 41:16	smoke 74:1
share 196:1	signing 127:10	socially 30:5
sharing 77:20	signs 152:7	solid 90:22 156:16 199:2
shop 30:12 33:6,7 148:14	similar 19:25 83:14 195:16 199:13	solved 207:18,19
short 26:6 106:4 121:5 139:17	simple 33:19	somebody's 38:3
shortly 52:9,18 118:25	simultaneous 101:3	sort 11:24 13:24 16:8 17:16 18:7,23 30:13 64:13 86:6 89:23 94:2 106:22 112:7,18 148:15 201:7,8 203:10
shot 159:9,19	Simultaneously 163:8	sound 7:23 30:24 117:8
show 57:1 61:6 62:24 63:1 67:17 95:16 103:22 184:19	single 177:10	sounds 6:14 15:10,13 30:25 54:24
showed 91:25 95:10 96:21 152:7 159:3	single-pole 22:4	source 27:24 84:18 90:10 95:21
showing 78:9,10 98:17	single-post 27:6	sources 95:8 96:2 97:1
shows 40:2 98:12,13 103:24,25 184:25	sir 13:18 37:8 40:1 43:4 50:6 103:1 121:16 124:23 166:1 169:9 173:16 191:23 193:1 205:10,24	South 7:22 168:22 196:4, 20
shut 76:21 77:2 81:9 82:7 84:1 89:1 91:5 92:10 93:13 99:23 105:8 107:21	site 98:18	spark 160:19
	sitting 129:11,12,14,20 130:13 209:21	sparking 87:12 120:9,16
	size 27:11 51:22 54:2 170:6 171:3,4,6 197:25 199:16	sparkler 88:19
	sizes 23:18 53:14 171:10 203:21	sparks 86:6 88:20 106:22
		speak 17:18 70:18 117:19 122:21,22
		speaking 101:3 161:11
		special 16:25
		specific 26:25 97:25 101:2 167:7

<p>specifically 18:24 24:4 161:14 185:24 194:3 197:5</p> <p>specs 16:3</p> <p>speed 161:23 183:13,16</p> <p>spend 123:24 124:1,4</p> <p>spent 124:9,14</p> <p>spiral 74:21</p> <p>splay 144:12</p> <p>spoke 122:23</p> <p>spoken 123:13</p> <p>spots 84:22</p> <p>stab-ins 90:20</p> <p>stack 47:21</p> <p>staircase 74:21</p> <p>standard 99:2 198:8 202:9,18 203:23</p> <p>standards 16:17 28:18 29:22 71:25 72:4,5 99:4 110:6 197:17,22 201:25 204:1</p> <p>stands 167:8,10</p> <p>start 34:3 84:16,19 91:13 119:8 120:2 156:24 175:18 176:16 182:5 193:25</p> <p>started 42:18 49:9 52:13 89:16 123:10 133:2 156:9,10,22,23 157:1,14 161:20 163:10 165:10 175:11 182:17 194:4,12 195:1,2,14,21</p> <p>starting 190:1</p> <p>state 12:2,3,17,19 18:9 19:7,9 29:18 72:12</p> <p>statement 27:16 106:24 109:10</p> <p>States 12:12 14:5,6</p>	<p>stating 60:15</p> <p>stay 86:6 155:15</p> <p>stick 37:24</p> <p>stop 9:19,21 92:7 93:5 147:9</p> <p>stopped 93:6 181:19 200:4</p> <p>storm 31:9,12 40:10</p> <p>stormy 120:13</p> <p>stove 27:10</p> <p>straight 90:22 159:19</p> <p>stranded 171:12,13,14</p> <p>strap 170:20</p> <p>street 58:14 105:14 196:21</p> <p>stressed 159:16</p> <p>stretched 118:21 141:13 142:9,15 143:1,9 157:23, 25 159:13 160:1</p> <p>stretching 159:1</p> <p>strip 101:4</p> <p>strong 160:22,24</p> <p>structure 107:4,6 150:13 186:4</p> <p>studied 202:4,5,8,21</p> <p>study 187:1 202:6</p> <p>stuff 13:24 16:8 17:16 18:5,7 26:11 30:13 75:9 95:14 106:22 112:7,18 126:14 189:24 201:20 203:14</p> <p>subdivision 8:20,23 9:10 34:5 55:24 56:8,9 58:7,22 60:25 62:16 63:3 64:20 65:1 68:24 69:24 70:10, 12 72:8,13 84:24 111:19 124:25 189:10,14</p> <p>subdivisions 72:19</p>	<p>subject 9:1</p> <p>subpanel 23:2,7 148:17, 24</p> <p>subpoena 125:19</p> <p>substation 34:4,13,18,20, 24 105:9</p> <p>substations 33:23 57:20 198:13</p> <p>sucker 175:11</p> <p>suddenly 160:18</p> <p>sufficient 193:24</p> <p>suggest 138:21 156:5</p> <p>suit 185:7</p> <p>summarize 24:23 81:17 105:19</p> <p>summer 112:13</p> <p>sunlight 119:12,19,20</p> <p>supply 39:11 94:6 126:2 148:11</p> <p>support 100:21 101:7</p> <p>supports 65:11</p> <p>supposed 8:8 16:19 38:24 39:3,5,9 41:4,25 61:8,10 71:17 78:9 97:8 98:3 105:11 111:16 132:7 137:12 153:14 173:10 177:17 197:19 201:9,12</p> <p>surface 84:20</p> <p>surge 21:18 40:8,12 82:7 92:2 135:22,25 136:2,7,8, 23 137:11,12,24 138:2,14 148:1 163:23 164:4,8,16, 20 165:5</p> <p>surges 138:6,19</p> <p>surging 91:9</p> <p>Swallow 6:12,14,21 7:15 10:20,23 11:1,6,10,19 31:15,24 37:2 44:10,12 46:16 54:20 55:1,7 63:23</p>
--	---	--

66:6,10 67:1,4,8 77:18,25
78:4 102:24 103:1,16
121:15,16 122:10 174:13,
17 189:8 192:24 193:3
204:3 205:3 210:19

swinging 195:12

switches 22:25 27:6
147:16

switchgear 17:25

sworn 6:8,19

system 29:19,24 33:2,4,
20 35:18 39:7,16,17
40:25 41:3,4,15 42:2,11
43:17 48:7,11 53:2 55:9,
13 58:7 66:1 72:13 94:18
106:5 110:3,4,5 145:23,
25 146:8,11 170:3,14,17
178:20 203:4 208:22

system's 49:18

systems 19:12 41:18,20
49:23 50:13

T

table 98:8,17 99:8

tablesaws 149:2

takes 38:7 39:8 42:1 50:3,
9 131:20,21 178:9

taking 8:11 67:18 140:25
141:22,23 183:11,13

talk 9:25 33:6 56:13 72:25
85:24 87:17 88:9 123:19
153:1,21 157:22 167:4
176:24 181:21 183:21
208:11

talked 17:16 36:16 38:17
58:13 62:21,22 68:7
87:18 88:11 94:12 104:15
120:8,20 123:15,16,18
135:20 148:15 152:9
153:25 175:2 180:23
193:8 197:14 207:21

talking 20:5 47:5 52:22
55:9 64:3 68:9 69:23 72:8
74:15,17 75:8,23,24
78:13 80:10 82:23 83:4
99:21,22 101:1 105:15
116:6 131:15 135:3
137:24 155:17 159:1,20
162:7,17 166:1 167:19
170:10,23 171:19 198:2
203:20 205:12 206:6,14
208:4,11,13 209:13

talks 203:2

tank 101:21 168:15
169:19

tariff 151:14,15,16,17

tech 15:21

telephone 42:24

telling 109:4 133:4,24
139:19 143:7,8 149:4,6
154:21 157:2 159:8
160:21 169:1,3 171:1
180:2 183:18 184:10
188:24 190:2,12,13
204:19 205:18

tells 79:17 98:11 187:12
190:16 198:12,13

Tennessee 12:3 13:25
14:12 18:9,13 19:3,4
183:25 184:4,9,11,17,21

term 63:24 75:13

terms 15:12 33:19

test 18:1,10 95:23

Tested 188:17

testified 6:19 188:12

testify 207:11

testifying 188:16,18

testimony 7:8 120:25
152:13,17 200:7

tests 18:11

Texas 7:23 8:15 12:2,18,
19,20,25 13:1 19:5,7,9
122:7 131:14,15 208:8,15

them's 22:3 113:1

theory 161:17

THHN 28:24

thing 84:11 91:16 96:23
105:14 106:6 112:20
113:7 120:3 136:2 143:3
148:19 149:12,15 151:3,5
159:18 162:24 172:6
173:12 175:21 177:17,21
180:17 181:7 192:14
197:3 201:7 202:16
204:13,19,20

things 10:16 15:14 16:15
17:3 18:19 30:13 89:21
90:1 96:10 97:13 131:3,
12 149:22 175:2 187:14
189:23 201:4 203:10

thought 53:7 85:6 117:11
127:22 147:15 173:19
180:25 184:3 194:4,6

thoughts 72:20 105:2

three-quarters 168:24
169:19

tie 185:7

tied 82:19

tight 112:21 117:17,20
118:3,4,21 142:15 143:1
159:16 160:1

tighter 63:11

till 8:9

time 6:4 8:11 11:12,13,14,
17 22:11 28:2,15 30:18
31:2,19,22 32:16 33:12
52:7,9,18 55:2,5 57:15
58:3,5,8,17 69:20 72:14
75:4 77:2 84:16,25 85:5
87:1 92:13,16 103:11,14
115:5 119:14 121:18,19,

<p>21 123:6,16 124:1,4,7,12 126:6 127:21 128:20,21 129:7,8,11,17,19 133:24 134:4 140:23 141:2 142:14 143:4 153:17 154:2,13,24 158:8,10 160:13 162:2,20,24 169:21 174:21,24 178:24, 25 181:24 182:9 183:11, 13 188:9 192:25 197:12, 13 204:5 210:20</p> <p>times 16:9 32:18,21 112:8</p> <p>today 6:3 9:17 13:20 60:4 95:9 120:25 121:3 122:8, 18,22 123:4,20,22 126:1, 8 127:18 160:21 188:16 204:5</p> <p>told 76:17 88:14 101:18 113:12 124:23 125:2 128:8,19 130:18 131:5 143:1,2,3 147:12 151:19 154:4 155:8,23 158:25 161:1,22 164:15 176:8, 11,17 179:1 181:23,25 182:10,11 183:24 184:3 188:8,15 192:12 204:22, 24 205:3</p> <p>tooken 97:11</p> <p>Toolbox 101:24</p> <p>tools 23:4</p> <p>top 21:23 24:6 26:1,8 36:2 37:4 40:1 43:14 61:24 78:9 98:21 134:22 135:21 136:3,4 143:18 150:8 154:8,15 155:2 170:14</p> <p>tore 20:16</p> <p>Torres 104:22 108:5</p> <p>Torry's 106:25</p> <p>total 124:14</p> <p>touch 153:14 179:25</p> <p>touching 119:15 179:14, 19 180:8</p>	<p>tour 56:9</p> <p>town 20:6 71:8</p> <p>trail 168:23 183:12</p> <p>training 13:23 14:21</p> <p>trans- 92:12</p> <p>transformer 16:19 35:9, 17 36:3,4,16 37:23,25 38:8,18,25 39:25 40:13, 21 41:6 42:20 44:1,19,20 45:1,24 46:9,25 47:7,22, 24 48:1 51:14,20 52:1 54:6 58:2 59:2,16 60:1,4 61:7,25 62:5,9,10 76:11, 17,19 77:1,7,8 78:8,20,23 79:1,9,10,13,18,20 80:5,7 81:1,2,14,18 83:12 84:1, 13 89:1,13 90:13 92:11 93:14 94:21 97:4 98:19 99:13,19,25 100:3,16,17 101:2,5 102:15 105:3,21 107:20 108:17 111:5,8 112:15 113:10,25 114:3, 8,21 115:24 116:3,6 119:10 145:10 146:4,9 158:2,5 162:12,13 166:6, 12,23 167:1,3,5,14,20,22 168:4,10,19 169:8,9,10, 12,23,25 170:13,22 175:3 176:22 180:24 181:4 183:8 186:3,9 190:9,11, 21 199:5,25 200:8,17,25 201:18 203:9 205:22 206:4,8,25 208:22 209:3, 13,21 210:7,14,15</p> <p>transformer's 60:19 204:25</p> <p>transformers 16:8,10,16, 20,21 17:3,23 18:6 19:12 35:4,5 55:8 57:22 59:22 90:7 100:23 105:10 112:10,23 167:6 189:23 198:13</p> <p>translate 90:14</p>	<p>transmission 34:25 55:9</p> <p>transmitted 33:23</p> <p>transport 117:16 118:4</p> <p>treatment 15:5</p> <p>tree 46:19</p> <p>trees 61:9</p> <p>trip 28:10 40:12,15 89:14 92:6 100:18 101:5,6 102:17 105:5 137:13 162:13 166:6 177:5</p> <p>triplex 42:12 49:7,10 63:15,19,25 64:2,8 73:5,7 74:15,24 75:5,24 76:1,9, 10,14,25 81:10,19 82:6 83:9,24 84:3,12 85:9,11 86:7 87:25 88:15,24 89:21 90:7,11,15 92:13, 16 93:14 99:12 101:10,19 106:19,21 107:1,10,18,24 108:1,8,16 115:8 117:15 119:6,9 120:7 139:12,15, 22,25 141:13 142:6,8,14 143:6,9 153:3 154:20 155:3,5,8,15,17 156:10 157:5,19 158:3,10,12,20, 21 159:2,10,23 161:18 163:2 164:6 165:10,14,17 166:11,13 175:6,10,12, 13,25 176:12 182:21 194:5</p> <p>tripped 40:21 93:16 105:21 106:14,16 162:11 166:13</p> <p>tripping 137:14</p> <p>trips 50:10</p> <p>truck 76:10,12,24 88:4 89:4 101:9,14,15,20,24 102:1,7,9,12,22 105:7 108:20 165:16 166:6,15 200:14</p> <p>trucks 18:19</p>
--	---	--

<p>true 161:6 176:20</p> <p>truthful 7:7</p> <p>turn 105:5</p> <p>turns 90:17 186:5</p> <p>twisted 42:13</p> <p>two-foot 159:17</p> <p>two-inch 24:7 159:17</p> <p>two-pole 22:4,5</p> <p>TXU 55:21</p> <p>type 18:21 41:18 127:14 131:12 132:5 149:7 150:2</p> <p>typed 127:13 146:24,25</p> <p>types 17:7 167:6 181:5</p>	<p>unit 39:9 144:17</p> <p>United 12:12 14:5,6</p> <p>University 13:25 14:11 19:3 183:25 184:4,9,11, 16,21</p> <p>unusual 142:13</p> <p>upgrades 71:24 154:5</p> <p>upside-down 21:4</p> <p>utilities 173:5,13,17 189:13 203:3</p> <p>utility 151:16 168:1 171:25 173:2 174:9 185:19,25 189:5</p> <p>utility's 153:9,14</p>	<p>42:19 80:15,25 83:25 91:18 92:9,12 93:7 105:4, 6 143:22 144:1,23 152:9, 15,16,18 162:17 163:13 164:2,25 176:23,25 177:2,3,25 180:16,18 204:17,21</p> <p>voltages 152:14</p> <p>volts 35:2,15,16 42:7,8 47:16,21 82:19 90:25 92:14 98:12,22,25 143:23 144:24,25 145:3,4,7 152:10 156:13,15 162:9 163:25 164:5 178:1 193:9,14,15,23</p>
U	V	W
<p>Uh-huh 57:19 75:16 82:17 109:6 115:16</p> <p>unconnect 154:19</p> <p>underneath 135:17 175:10 176:5,7</p> <p>understand 9:20 17:13 18:18 31:11 32:6 56:8,19 63:18 78:18 80:23 93:4 99:24 102:14 128:14 136:22 139:23 158:24 159:22 161:15 165:11 180:1 187:16 190:4 195:20 202:24 206:10</p> <p>understanding 26:18 78:22 91:8 127:24 200:6</p> <p>understood 200:12</p> <p>unincorporated 70:11,13, 15,16</p> <p>unintelligible 19:7 82:3 89:15 144:25 149:21 172:21</p> <p>union 12:11 14:4</p>	<p>varies 34:14</p> <p>vehicle 139:13 155:16</p> <p>vent-a-hood 27:9</p> <p>versus 41:15 42:16</p> <p>Vietnam 14:8</p> <p>violate 99:8</p> <p>violated 97:25 99:5</p> <p>violation 99:2</p> <p>violations 110:3</p> <p>visible 27:13</p> <p>visit 30:7</p> <p>visited 32:14,16</p> <p>Vista 7:22 20:6 39:21 45:2 50:22 51:16 56:2 57:8 64:15,19 69:7 73:15 86:15 113:17 168:22 196:4,20</p> <p>Vistas 57:8</p> <p>volt 36:5 98:24</p> <p>voltage 34:12,25 35:5,10</p>	<p>wait 119:7 128:14 192:3</p> <p>waited 183:18</p> <p>walked 89:7</p> <p>Walker 113:1</p> <p>wall 20:17 135:11 184:16</p> <p>walls 26:25 91:10 148:5</p> <p>Walt 26:16 39:18,20 40:8 42:20 44:14 45:1 46:4 49:1,8 50:21 51:11,15 56:17,19,22 57:24 59:5,7, 9 61:16 64:14 65:22 70:22 73:4,20 74:6 75:3 76:9,11,23 78:24 81:15 82:20 83:2,3 85:1,3 86:2, 14 87:6,11 88:9,24 91:2 92:15,17 93:10 101:2,13 108:19 109:4 113:12 115:15 116:20 118:14 148:11 158:11</p> <p>Walt's 20:21 42:14 62:25 78:1 87:25 89:15 99:13 101:9,14,19 105:7 114:2 165:15,16 166:6</p> <p>Walton 7:16 19:16 45:1 50:21 51:15 52:1 56:5</p>

64:14 116:3	103:16 108:25 120:19	wiring 14:23 15:14 16:1
wanted 52:20 63:1 87:2	121:25 125:18,25 126:22	20:9 22:22 23:17 27:13
90:8 103:4 108:21,23	133:11 136:16 137:22	29:18,19 30:4,21 148:7
113:7 180:12,21	139:10 143:16 145:17	150:12 152:20 153:9
Washington 15:2	146:18 175:1 193:5	192:21
watching 158:14	204:4,14 210:19	witnessed 88:7 105:25
water 15:5 24:21 84:15	wire 10:17 16:4,5 22:1	106:6,7
119:21,25	23:12 25:16 26:11 27:19,	witnesses 120:8
ways 103:18	20 28:19,20 29:1,3 36:2	wondered 186:1 208:19
weather 119:17	38:23 43:3,9,10 44:22	wondering 103:3 147:4
weatherhead 17:10 20:21	47:6,17,22 48:20,23,24	wooden 139:14
23:21 24:5,10,11,15,17,	49:13 51:19 52:1,5,8,17	woodworking 131:11
19,24 25:2,13 26:1,4 73:6	53:7,8,10,11,12 54:5,14	words 131:23
74:15 85:3 132:19 152:6,	57:21 64:3 76:1,2 91:21	work 10:11 11:22 12:24
21 153:2,6 154:15,20	97:7,9,12 105:16,22	15:1,18 16:23 17:19,22
155:5,12 157:15 186:3,5,	111:12 114:11 134:25	18:21,25 19:11 20:4,15,
6,11,16	135:9,15,16 148:11	19 21:13 22:9,19,22 23:2,
website 137:23	156:10,11,15 158:1	8,16 26:13,14,21 28:16
week 32:22	170:6,7,10,12,23 171:2,7,	29:20 33:5,12,20 34:6
weird 70:5	8,9,12,17 179:11,13,19	37:25 39:13,14 40:7 41:9
weld 193:13	180:7,8 188:25 192:22	48:10 49:23 54:23 78:9,
welder 193:18,22	194:14 198:1,22 199:1,4,	11 80:7 110:1 125:2,3
welding 193:21	14,16,18 200:3,12 203:21	128:9,25 130:8,9 137:11
Wells 70:6,8 71:8	205:1,5,13,16,17 206:6,	148:18 149:7 151:23
West 71:7	14 207:1,5,12,14	169:16 185:5,9 200:1,3
whatsoever 25:17 67:20	wire/insulation 160:18	205:16 206:25 208:24
white 26:2,11 84:21	wired 23:5 209:3	209:4
144:7,8	wires 17:5 21:24 24:1,16,	worked 14:3,4,6 15:8 16:9
wind 117:21 119:20,22	24 25:2,11,25 26:2,3,7,9,	24:5 81:4 93:15 100:5,8
120:14 159:19 161:23	22 43:13,20 44:21,23	125:4 168:1 185:14,19
195:12	47:16 48:18 68:9 82:14	Workers 12:11 14:3
windings 35:12 36:5	85:7,14 89:20 90:13 91:3,	working 16:7 19:16 50:13
146:9	10,12,19 92:15 93:11	76:19 94:21 100:18 133:2
winds 160:7,11,14,17,22,	95:10,11 102:3,6 106:21	153:16 200:17 209:16
24 161:7,8,11,16 195:5	107:1,2,11 108:2,8,9	works 34:2 37:24 84:14,
Winkfein 6:8,18,22,24 7:1	112:23 114:7,23 134:17,	17 87:19
8:14 10:3,21 11:3,19 12:6	21,22 135:20 137:6	worry 13:19
31:24 44:17 46:17 53:16	139:12 143:17,21,23	wrestlers 130:16
55:7 67:9 77:12 95:5	144:1,8,19 152:5 153:2,6	write 146:21,23
	154:8,15,20 155:4 157:5,	writing 108:24
	7,8,24,25 159:9 160:18	
	171:7 181:19 194:15,21	
	195:10,11 198:11,12	
	199:10 200:13,14 201:6,	
	13 203:9,21	

written 177:7

wrong 51:22 118:20 139:4
143:6,8 166:24 169:23
170:6 171:2,4,6 188:25

wrote 127:1 146:23,25
161:1

Y

y'all 9:5 19:22 30:4 54:20
56:7,25 57:1 58:14 60:2,
12,24 61:5 62:12 63:2
64:25 65:9 66:21 67:11,
22 68:5,22 70:3 78:1

yard 156:23 157:2 182:20,
21

year 12:22,23 147:6

years 8:17 9:10 10:9 13:4,
6 14:4,22 16:11 19:21
20:1,13 31:10,11,14 32:7
95:24 103:25 111:19
113:6 119:10 122:16
124:25 147:6 152:7
184:12,13 185:10 199:9

yellow 138:2

yesterday 32:5 123:18
124:2

Z

zip 70:6

zoom 8:4 37:2 45:15
48:15 68:12 74:14,16
80:13 203:20

zooming 83:7